

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SECURITIES AND EXCHANGE	)	Civil Action No: 15-cv-05843-JCJ
COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
SUMMIT TRUST COMPANY,	)	
RAMPART CAPITAL MANAGEMENT,	)	
LLC, TRUST COUNSELORS	)	
NETWORK, INC., BROWN	)	
INVESTMENT ADVISORS, INC.	)	
KEVIN C. BROWN, and GEORGE P.	)	
BROWN,	)	
	)	
Defendants,	)	
	)	
and	)	
	)	
RAMPART FUND LP, WEALTH	)	
MAINTENANCE ORGANIZATION,	)	
LLC, and HODDINOTT FARM	)	
DEVELOPMENT, LLC,	)	
	)	
Relief Defendants.	)	

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**FINAL REPORT OF RECEIVER AND FEE APPLICATION #17 WITH RESPECT TO  
THE RECEIVERSHIP PARTIES**

**THIS APPLICATION COVERS THIRTEEN MONTHS FROM JULY 2020 THROUGH  
JULY 2021**

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Ricardo J. Zayas (the “Receiver”), by and through his undersigned counsel hereby files this final report and seventeenth fee application with respect to the Receivership Parties. As discussed herein, the goals of the Summit Receivership have been largely accomplished. Upon Court

approval of this report and final fee application, remaining assets of the Receivership entities will be consolidated and used to satisfy outstanding obligations of the Receivership entities, including fees to the Receiver and his Counsel.<sup>1</sup> Assets held within individual client accounts will be transferred to the custody and control of the SEC. The Receiver respectfully submits:

1. On November 24, 2015 this Court entered an order (the “Order”) in the above-captioned action, which among other things, established the receivership of Defendants Summit Trust Company (“STC”), Trust Counselors Network, Inc. (“TCN”) and Relief Defendant Rampart Fund, LP (“Rampart,” collectively with TCN and STC, the “Receivership Parties”) and appointing the Receiver in this matter (**Exhibit A**).

2. Under paragraph 6 of the Order, the Receiver was, in part, authorized to take custody of all Receivership property; identify assets of each of the Receivership Parties; manage and maintain the Receivership properties and take actions necessary and appropriate for the preservation of Receivership property. The Receivership entities held assets for several thousand “client” accounts. Upon inspection, these assets included cash accounts, securities and other property.

3. As stated, at this writing, the objectives of the Receivership have, in large part, been completed. The Receivership entities will prepare and submit final tax reporting requirements for 2021. As required by the Order, the Receiver and staff have taken measures to complete the tasks outlined in Paragraph 2 and return assets to the clients of the Receivership entities. These measures have included:

- Inspection of business records;

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<sup>1</sup> As part of this consolidation, amounts held in TCN accounts will be transferred to STC to offset more than \$2,000,000 excess transfers from STC to TCN (see paragraph 21).

- Identification and communication with clients of the Receivership entities;
- Transfer of assets held on behalf of STC clients, and
- Identification and liquidation of assets of the Receivership.

4. At this writing the remaining valuable assets of the Receivership consist of potential recoveries from Paul Ellis Investments Associates, LLC, et al. restitution and Forefront Talking Capital default. In addition, the Receivership continues to hold assets on behalf of others (i.e. clients of former Receivership entities) for which efforts to locate and transfer have been unsuccessful. These assets held in “client accounts” will be delivered to the SEC. Additional information and a schedule of these “client accounts” is presented later in this report.

4. Upon the entry of the Order, it was understood by the SEC and the Receiver that STC served as a custodian for more than 3,000 self-directed or advisor-directed trust accounts. These trust accounts included individual IRA’s and other trust vehicles with reported assets of more than \$230,000,000. It was further understood by the SEC and the Receiver that STC would continue to service these trust accounts during the pendency of the Receivership. Based upon these understandings and initial meetings with persons engaged in the day-to-day management of STC, the Receiver continued servicing of more than 3,000 accounts under STC’s custody. These servicing activities included processing distribution and transaction requests for STC clients and paying current obligations as they came due. During the term of the receivership, the Receiver and staff processed distributions and transactions valued at more than \$200 million. The Receiver also determined that TCN and Rampart were not engaged in any ongoing business activities and accordingly directed that all TCN and Rampart business activity be suspended pending further determination.

5. The active servicing of client accounts spanned the period from the inception of the

Receivership until the Summer of 2017. This active servicing was an operational role in the affairs of Summit Trust Company which entailed:

- Daily oversight of STC business operations including monitoring of accounts payable, consultation on selected trust operations, participation in meetings, interaction with STC clients and consultation on tax compliance matters.
- Ongoing communications with the Nevada FID and other regulatory authorities to address relevant issues; and
- Inspection of available hardcopy and electronic records to improve operational knowledge and, as warranted, respond to client requests and U.S. government requests.

6. The above-described operational duties continued through the second calendar quarter of 2017 when operational responsibility for more than 900 client accounts was transferred to Austin Capital Trust Company (ACTC). With the transfer to ACTC, the daily operations of the Receiver and staff moved towards discontinuing all active operations, liquidating STC assets and assessment of potential recovery scenarios. While operational duties were reduced, the Receiver and staff continued to:

- Analyze and track remaining client accounts for transfer to a new custodians;
- Interact with STC personnel and consultants to maintain current client accounts; and
- Interact with entities that had been recipients of “investments” or other funds prior to 2016.

7. The Receiver worked with Representatives of the Receivership Parties to compile information relating to (a) the identity, location and estimated value of all known Receivership

Property (as defined in the Order); (b) all employees (and job titles thereof), other personnel, attorneys, accountants and any other agents or contractors of each of the Receivership Parties; and (c) the names, addresses and amounts of claims of all known creditors of each of the Receivership Parties.

8. Specific services provided during the period July 2020 through July 2021 varied with each Receivership entity. Additional details concerning services provided for each Receivership entity follow.

**Summit Trust Company (STC)**

9. As previously reported, the servicing of 942 STC client accounts was transferred to ACTC (i.e. new custodian) as of June 30, 2017 in accordance with provisions of the Asset Purchase Agreement (“APA”) that had been finalized during the second calendar quarter of 2017. The corresponding transfer of STC client accounts and related assets to ACTC occurred in May, June and July 2017.

10. Effective with the transfer of client accounts and related assets to ACTC the Receiver and staff had processed approximately \$36,000,000 of client cash transactions and other non-cash assets totaling more than \$195,000,000. While the ACTC transfers accounted for the majority of the former STC client accounts and related assets, there were several hundred STC client accounts that did not transfer to ACTC. In general, the client accounts that did not transfer to ACTC held “investments” in non-traditional assets or in products / entities that were non-performing and, at times, deemed worthless.

11. The Receiver and staff continued to be involved with STC operational matters (including Trust operations) throughout the balance of 2017 and continuing into 2018 for accounts that had not transferred to ACTC. This included ongoing interaction with trust clients and their

advisors to facilitate transfers and address inquiries concerning the receivership, correction of inaccurate STC / Revzon Consulting Group client account records, collection of amounts due to STC from outstanding loans / investments and preparation of trust accounts for transfer to a new custodian. The Receiver and staff discontinued active business operations and vacated business premises in Colmar, PA in 2018. All former STC personnel were terminated effective March 30, 2018. The Colmar premises were vacated in May 2018 and arrangements were made to archive required business records.

12. Account analyses undertaken to facilitate the transfer to ACTC yielded an enhanced understanding of STC's historical business operations and determined that the Brown's had not operated STC or the other Receivership entities with a for-profit motive. As previously reported, STC had not reconciled the STC trust bank accounts (i.e. client funds) to the client account system (i.e. Accutrust Gold) for at least three years preceding the imposition of the Receivership. In March 2015 the STC client accounts were overdrawn by at least \$342,459. The overdraft condition was partially reduced when Rampart and TCN assets were liquidated and remitted to STC.

13. During 2018 the Receiver continued efforts to recover investments held by STC with various entities including Forefront Capital and related entities, Snowden Capital, Adcor Industries, Unation, Capital Windows, The Underwriters Group ("TUG") and Nevada Mining Company. Inspection of receivership business records raised concerns that several of the above listed parties improperly derived funds from the receivership entities and "client accounts." These concerns were reported to the U.S. Attorney's Office. The extent of these recovery efforts was impaired due to availability of funds. Given insufficient funds, the Receiver discontinued efforts to recover investments made by STC with client funds. Throughout the pendency of the

Receivership, the Receiver provided assistance to the SEC, law enforcement authorities and other regulatory agencies to assist with their investigations or recovery efforts. Personnel assigned to the Receivership are available to consult with the SEC, law enforcement and other regulatory agencies in STC related matters.

14. In May 2018, the Receiver was notified that ACTC had not been successful in formalizing account relationships with approximately 430 former STC clients due to inability to locate / secure responses from these former STC clients or, at times, refusal by these former STC clients to enter into Trust and custodial agreements with ACTC. ACTC returned more than \$2,500,000 of cash and other assets relating to these former STC clients to the custody of the Receiver.

15. With the return of accounts by ACTC the Receiver performed the following activities during the balance of 2018, 2019, 2020 and continuing into 2021.

- Accounted for and organized information for the accounts and assets returned by ACTC;
- Continued efforts to transfer accounts and related assets for STC clients including those returned by ACTC. These activities included efforts to transfer assets in an Australian firm held by approximately 225 STC clients;
- Coordinated with Regulatory and law enforcement authorities, as required; and
- Responded to STC client inquiries and addressing other issues as they arose.

16. During 2018 the Receiver became involved in efforts to assist STC clients with efforts to recover investments in so-called “viaticals.” The STC entities had placed client funds in these “investment” products. The promoters / sponsors of these products had filed for bankruptcy protection in the 2015 time period. In late 2018 and early 2019 the Receiver was notified that the

Trust formed by the bankruptcy court had begun distributions to former STC clients. The Receiver facilitated distributions to STC clients holding “viaticals” during 2020.

17. As previously reported, the Receiver’s civil recovery action against Adcor Industries on behalf of STC and certain clients went to trial in February 2019 in U.S. District Court in Maryland. After a multi-day trial, the Court found in favor of the defendant citing a statute of limitations issue. In July 2021, the Circuit Court of Appeals upheld the verdict for the Defendant. This matter is now closed with no further action contemplated.

18. During 2021, STC sold investments (i.e. not assets held in client accounts), including:

- STC was the holder of share certificates for a company located in Australia. Certain of these shares were allocated to individual client accounts. A total of 13,884 shares were sold at \$7.50 per share; and
- STC’s investment in several real estate ventures. The sale of the underlying property occurred in June 2021. Cash distributions relating to these investments received after June 30, 2021 are included in this report.

19. In 2012, STC filed litigation against Paul Ellis Investment Associates, LLC, et al. and a judgment was ordered in August 2013 for \$761,426.16 due to both STC and multiple STC clients. The SEC filed a complaint against Joseph Andrew Paul, John D. Ellis, Jr., et al. in April 2016. The Receivership currently understands that the restitution is pending. The Receiver has identified parties to be compensated from a “Paul Ellis” recovery. Personnel assigned to the Receivership are available to consult with the allocation and distribution of recovered funds.

20. Throughout the pendency of the Receivership, the Receiver:

- transferred accounts to new custodians,



- disbursed assets from accounts to clients, and
- identified and closed “client accounts” that did not hold valuable assets or were no longer viable.

The Receiver and staff successfully transferred / closed more than 3,000 “client accounts” identified in the STC business records. **Appendix 1** provides a brief summary of the types of accounts and holdings that are considered open per the STC records. **Appendix 2** provides a list of those accounts considered open.

### **Trust Counselors Network (TCN)**

21. As previously reported, the TCN client universe differed from STC and Rampart, in that, the accounts were usually established with charitable contributions and included foundations established to pursue some charitable endeavor and charitable remainder trusts established to provide annuity income to the grantor and a residual interest to a charity pursuant to certain IRS provisions. TCN did not adhere to titling conventions or prescribed business practices when soliciting and receiving funds from clients. Furthermore, investigation revealed TCN did not routinely place funds received from clients in trust or escrow-type accounts. In practice, TCN received client funds and used those client funds for business operations or to satisfy current obligations to other clients. TCN did not use client funds to acquire investment products that would enable TCN to meet promises made to its clients (i.e. client obligations).<sup>2</sup>

21. Reported findings of the SEC coupled with our analysis of financial transactions between STC and TCN identified commingling of STC and TCN business and client assets and material overdrafts (i.e. negative cash balances) constituting an amount payable to the STC client account, similar to the Rampart overdraft discussed herein. Analyses show that STC infused /

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<sup>2</sup> Adequately funded TCN accounts were transferred to STC prior to the appointment of the Receiver.

deposited at least \$3,500,000 into TCN to allow TCN to pay operating expenses and satisfy other obligations. TCN returned approximately \$1,200,000 to STC leaving TCN obligated to STC in the approximate amount of \$2,300,000, not including approximately \$184,000 of benefit payments to TCN clients made with STC client funds through the STC Client bank account.

22. Given these findings, a Motion for an Order authorizing the Receiver to Combine Assets Held in Multiple Accounts into the Estate of Trust Counselors Network was submitted to the Court in February 2018. This Motion was approved by the Court in March 2018.

23. As provided for by this Motion and Order, the Receiver began marshalling pertinent accounts and assets during 2018. Efforts to identify and marshal assets continued throughout 2018, 2019, 2020 and through the termination of the Receivership. As part of these efforts the Receiver identified and communicated with various insurance companies regarding annuity policies purchased by TCN. At this writing, the Receiver has identified and liquidated approximately \$717,000 of TCN annuity policies as of December 31, 2019. In March 2021, \$111,687 of TCN annuity policies have were converted to cash. In addition to converting the annuities to cash, TCN also converted the “Position Holder Trusts Interest of Life Partners Position Holder Trust” (previously known as “viaticals”) to cash in the amount of \$2,709 and received death benefits from a policy in the amount of \$6,737. In addition to funds received from the Position Holder Trust, TCN received a final distribution from the Life Partners Creditors Trust bankruptcy estate.

24. Investment accounts with Delaware Funds by Macquarie and eight separate accounts at Fidelity Investments were liquidated and funds returned to TCN. TCN received \$2,079 from the Delaware Funds by Macquarie and \$531 from the Fidelity accounts.

#### **Rampart Fund, LP (Rampart)**

25. Services performed during the third and fourth calendar quarters of 2020 through

the termination of the Receivership were limited to addressing tax compliance issues and closing bank accounts for the Estate of Rampart Fund, LP in March 2021.

26. As previously reported, by early 2015 the STC client account universe had been overdrawn by approximately \$170,000 to make payments to Rampart Note holders. In anticipation of transferring assets to a new custodian, Rampart liquidated certain assets to facilitate restoration of the aforementioned overdraft. In January 2018, Rampart assets were liquidated and transferred to the STC Client account to relieve this portion of the overdraft condition that existed within the SCT client accounts. These funds were used to fund client transfers to new custodians.

27. During the second half of 2020, Rampart satisfied outstanding fees to legal counsel and the Receiver.

28. As previously reported, the Receiver, through his counsel, conducted an “asset search” to assess the collectability of the so-called “TUG” note receivable and judgment. The amount of the judgment exceeds \$7M. This so-called “TUG” note is deemed uncollectible. Absent this recovery, the Receiver terminated all activities related to Rampart during 2020.

29. In January 2016 the Receiver reported the following assets and liabilities for the Receivership Parties at December 31, 2015:

	<b>Summit Trust Company</b>	<b>Trust Counselors Network, Inc.</b>	<b>Rampart Fund, LP</b>
Assets	\$2,285,679	\$440,213	\$409,716
Liabilities (incl. SEC Judgment)	\$19,057,782	\$10,531,901	\$3,941,260
Excess Assets (Liabilities)	(\$16,772,103)	(\$10,091,689)	(\$3,531,544)

Investigation and analysis to identify the universe of assets or potential assets and potential claims against those assets continued throughout 2016 and the first calendar quarter of 2017.

31. At June 30, 2020 the Receivership Parties show the following assets and liabilities. Non-cash assets are shown at December 31, 2015 amounts unless converted to cash or deemed

uncollectible based upon receipt of specific relevant information during the period. The reported liabilities for the Receivership Parties are adjusted to include approved but unpaid fees. The reported liabilities do not include applications for Receiver fees that were submitted and pending approval.

	<b>Summit Trust Company</b>	<b>Trust Counselors Network, Inc.</b>	<b>Rampart Fund, LP</b>
Assets	\$388,034	\$684,495	\$92,296
Liabilities (incl. SEC Judgment)	\$20,550,054	\$10,593,620	\$3,997,647
Excess Assets (Liabilities)	(\$20,162,020)	(\$9,909,125)	(\$3,902,351)

32. At July 31, 2021 the Receivership Parties show the following assets and liabilities. Non-cash assets are shown at December 31, 2015 amounts unless converted to cash or deemed uncollectible based upon receipt of specific relevant information during the period. The reported liabilities for the Receivership Parties are adjusted to include approved but unpaid fees. The reported liabilities have been adjusted to include applications for Receiver fees are submitted and pending approval.

	<b>Summit Trust Company</b>	<b>Trust Counselors Network, Inc.</b>	<b>Rampart Fund, LP</b>
Assets	\$887,024	\$530,650	\$0
Liabilities (incl. SEC Judgment)	\$20,280,060	\$10,531,901	\$3,943,159
Excess Assets (Liabilities)	(\$19,393,036)	(\$10,001,251)	(\$3,943,159)

33. Reported changes in the net asset amounts at June 30, 2020 when compared to July 31, 2021 are primarily attributable to the following:

- Summit Trust Company - The net increase in reported assets was attributable to the June 2021 sale of a real estate investment held by STC, partial recovery of amounts advanced to TCN to pay TCN annuity obligations, recordation of fees receivable for monitoring and services provided to client accounts returned in 2018 by ACTC,

and recovery of funds titled to STC that were held in the client account universe. The Receiver closed bank accounts and caused final tax returns for Hoddinott Farm Development, LLC to be filed. Fees and STC amounts held in client accounts were not previously recorded due to realization concerns. Condition of the STC client records raised concerns that there would be insufficient cash available for client accounts. At this writing, there have not been any STC client inquiries relating to unrecorded accounts for more than twenty-four (24) months. Reported liabilities decreased due to payments of outstanding obligations to the Receiver and Counsel, resulting in a decrease in excess liabilities.

- Trust Counselors Network - The changes in reported net assets were primarily attributable to asset liquidation and annuity policy recoveries totaling \$133,313 less payment of accumulated fees to the Receiver and Counsel in the amount of \$62,460 and restoration to Summit Trust Company of amounts advanced by STC to fund TCN annuity payments (\$183,329) overdraft balances on TCN annuity.
- Rampart Fund, LP – The decrease in reported assets is attributable to liquidation of a Raymond James investment account, the subsequent payment of approved fees and write-off of two “investments” totaling \$29,427 which were determined to be uncollectible. The remaining cash asset of \$12,217 from the Rampart bank account was transferred to Estate of Summit Trust Company operating account in anticipation of closing. The SEC judgement and accounts payable consisting of unpaid fees due the Receiver at July 31, 2021 are the only remaining entries on the Rampart balance sheet.

34. As discussed above, STC conducted active trust operations throughout calendar

year 2016 and the first and second calendar quarters of 2017. The need to service client accounts for this time period was attributable to multiple factors outlined above including the process of identifying active accounts and preparing client accounts for transfer to a new custodian, the process of identifying and selecting a new custodian and legal and operational challenges arising from the aforementioned Forefront Talking Capital default.

35. The following table summarizes information relating to applications submitted to the Court by the Receiver for fees and expenses incurred since November 2015.

<b>Application #</b>	<b>Period Covered</b>	<b>Summit Trust Company</b>	<b>Trust Counselors Network, Inc.</b>	<b>Rampart Fund, LP</b>	<b>Totals</b>	<b>Approved / Pending</b>
1	4 <sup>th</sup> Quarter 2015	\$36,693.32	\$9,577.50	\$3,092.00	\$49,362.82	3/11/16
2	1 <sup>st</sup> Quarter 2016	\$133,644.95	\$60,941.69	\$20,498.41	\$215,082.05	10/11/16
3	2 <sup>nd</sup> Quarter 2016	\$186,034.52	\$18,146.00	\$16,865.50	\$221,046.02	1/25/17
4	3 <sup>rd</sup> Quarter 2016	\$173,803.22	\$11,693.50	\$5,126.00	\$190,622.72	3/16/17
5	4 <sup>th</sup> Quarter 2016	\$150,032.27	\$4,070.00	\$1,090.00	\$155,192.27	7/18/17
6	1 <sup>st</sup> Quarter 2017	\$188,944.56	\$17,806.00	\$5,044.00	\$211,794.56	1/3/19
7	2 <sup>nd</sup> Quarter 2017	\$161,165.00	\$10,908.50	\$900.00	\$172,973.50	1/3/19
8	3 <sup>rd</sup> Quarter 2017	\$169,826.65	\$13,265.00	\$1,800.00	\$184,891.65	1/3/19
9	4 <sup>th</sup> Quarter 2017	\$116,652.13	\$22,760.50	\$2,905.50	\$142,318.13	5/5/19
10	1 <sup>st</sup> Quarter 2018	\$121,492.65	\$16,033.49	\$5,227.50	\$142,753.64	5/5/19
11	2 <sup>nd</sup> Quarter 2018	\$121,853.30	\$12,312.00	\$3,050.00	\$137,215.30	1/22/20
12	3 <sup>rd</sup> Quarter 2018	\$62,007.49	\$4,486.00	\$398.50	\$66,891.99	1/22/20
13	4 <sup>th</sup> Quarter 2018	\$46,520.01	\$1,498.00	\$468.00	\$48,482.01	1/22/20
14	1 <sup>st</sup> – 2 <sup>nd</sup> QTR 2019	\$112,891.58	\$6,259.75	\$2,826.50	\$121,978.33	11/10/20
15	3 <sup>rd</sup> – 4 <sup>th</sup> QTR 2019	\$37,800.47	\$3,108.84	\$994.00	\$41,903.31	11/10/20
16	1 <sup>st</sup> – 2 <sup>nd</sup> QTR 2020	\$45,633.50	\$5,036.00	\$4,201.50	\$54,871.00	11/10/20

36. At this writing, the Receiver has prepared and is submitting for approval, an application for fees and expenses incurred during the thirteen months ending July 31, 2021 in the amount of \$192,811.39, as follows:

	<b>Summit Trust Company</b>	<b>Trust Counselors Network, Inc.</b>	<b>Rampart Fund, LP</b>	<b>Totals</b>
Application for Fee - Receiver	\$174,969.50	\$12,547.75	\$3,078.00	\$190,595.25
Expenses / Costs - Receiver	\$2,216.14	\$0.00	\$0.00	\$2,216.14
Totals by Entity	\$177,185.64	\$12,547.75	\$3,078.00	\$192,811.39

37. The Receiver has rendered services from January 1, 2020 through July 31, 2020 totaling 644.75 hours, as follows:

<u>Exhibit B-1, Hours for Summit Trust Company</u>	<u>592.20</u>
<u>Exhibit B-2, Hours for Trust Counselors Network, Inc.</u>	<u>11.40</u>
<u>Exhibit B-3, Hours for Rampart Funds, LP</u>	<u>41.15</u>
<u>Total Hours - Application #17</u>	<u>644.75</u>

38. The Receiver maintains contemporaneous records of the time expended for the professional services and expenses performed in connection with this matter and such records are maintained in the ordinary course of its business. These records provide a detailed description of the services rendered and expenses incurred during the period for which this Application is being made. Summaries of the Receiver's time records totaling \$190,595.25 are presented as Exhibit "B1, B2 and B3." These summaries are chronological records of time spent by the Receiver. If the Court requires any further descriptions on these time entries, the Receiver will provide additional information.

39. The Receiver believes that the services for the period July 1, 2020 through July 31, 2021 ("Compensation Period") are reasonably worth the sum of \$190,595.25 as set forth in the summary identified as Exhibit "B" and costs in the amount of \$2,216.14. The Receiver notes that these costs are customary charges made to other firm clients in the ordinary course of its billing

practice and are consistent with rates proposed for this engagement. The hourly rates for the persons shown on Exhibit B-1, B-2 and B-3 are presented on Exhibit C to this application. These rates are in agreement with the rates shown in the original proposal and approved in the Order.

40. To assist the Court in its review of the fees sought by Applicant, Applicant has attached its monthly statements in Exhibits B-1, B-2 and B-3, as follows:

<u>Exhibit B-1, Fees for Summit Trust Company</u>	<u>\$ 174,969.50</u>
<u>Exhibit B-2, Fees for Trust Counselors Network, Inc.</u>	<u>\$ 12,547.75</u>
<u>Exhibit B-3, Fees for Rampart Funds, LP</u>	<u>\$ 3,078.00</u>
<u>Total Fees Requested with Application #16</u>	<u>\$ 190,595.25</u>

41. During the period covered by this 17<sup>th</sup> Report and Interim Fee Application, the Receiver also incurred costs in the amount of \$2,216.14.

42. During the period covered by this Report and Interim Fee Application, the Receiver was engaged with Receivership party matters and has not represented any entity in this case having an adverse interest to the receivership Parties.

43. In closing, I certify that:

- I have read this report and fee application;
- To the best of my knowledge, the fees and expenses submitted herein are true and accurate and comply with the billing instructions;
- The fees are based on the rates listed on the fee schedule (Exhibit C) and are reasonable, necessary and commensurate with the skill and experience required for the activity performed;
- There are no amounts included in this fee application seeking reimbursement for the cost of any investment, equipment or capital outlay; and



- Any requests for reimbursement for contracted services purchased or contracted from a third party are limited to the amount billed to the Receiver and paid to the provider. The Receiver certifies that neither he nor Marcum is making any profit on reimbursable services.

WHEREFORE, the Receiver prays this Court to enter an Order in the form attached hereto granting the Receiver compensation from July 1, 2020 through July 31, 2021 in the amount of \$192,811.39.

Dated: October 5, 2021

Respectfully submitted,



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215-297-2320  
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*Receiver for The Receivership Estates of  
Summit Trust Company, Trust Counselors  
Network Inc. and Rampart Fund LP*

# APPENDIX 1

*Appendix 1***OPEN ACCOUNTS**

The accounts remaining open per the available records of STC are separated into designated categories. There are 197 accounts that remain open according to the available STC records. Efforts to locate and distribute and transfer assets were made and unsuccessful. The value of the non-liquid assets is unknown.

***Cash and Other Assets***

STC currently holds twenty-one accounts containing cash and other assets. Three accounts are custody accounts and eighteen are IRA accounts. According to available records, five of the IRA accounts hold non-liquid assets including investments in REITs, LPs, LLCs and mutual funds. Efforts were made to locate and distribute funds to the individuals or transfer the accounts. Stop payments were issued on five checks that were delivered / unreturned and not cashed. Total cash in these accounts is \$120,070.16. The current value of the non-liquid investments is unknown.

***Trusts***

STC delivered trust resignation letters or transferred all trusts identified as having Summit Trust Company as a trustee. STC is currently holding \$28,260 for a trust terminated and distributed. Two beneficiaries could not be located for this trust.

***HighStreet Financial LLC / UNATION Accounts***

HighStreet Financial LLC established accounts with STC to hold certain hedge funds managed by HighStreet and UNATION stock (a related entity). All hedge funds have been liquidated and accounts transferred or disbursed. The accounts holding UNATION stock have been transferred and closed. Four account remain open, one with cash from a liquidated hedge fund (\$14,649.41) and an unrelated private holding, two with private notes, and one holding UNATION stock and a private note. All accounts are IRA accounts.

The Receiver made multiple attempts to contact UNATION and its representatives in an effort to liquidate the UNATION stock held by STC. UNATION and its representatives did not respond to the liquidation requests made by the Receivership.

***Cash Accounts – Proceeds from Liquidated Treasury Bonds***

IRA accounts were established at STC to hold promissory notes from Omega Investment Partners, LLC and Liberty Investment Partners, LLC along with U.S. Treasury Bonds. The notes were managed by Edward A. Young. Young was indicted in multiple venues for insurance fraud and selling of unregistered securities.

The treasury bonds were liquidated and cash proceeds distributed or transferred to all but four IRA accounts. Multiple efforts have been made to locate the individuals. The total cash held in the accounts is \$57,352.67.

***Cash Accounts – Proceeds from Liquidated DFA Investments***

Both IRA and custodial accounts were established at STC to invest in DFA mutual funds along with other investments. All DFA investments have been liquidated and proceeds have been transferred or distributed for all accounts except two custodial accounts. The remaining balance in the DFA client accounts is \$69,337.07. Multiple efforts have been made to locate the account holders.

***“ABK” Accounts***

Alex Kleyner and ABK Capital established custodial accounts at STC for certain stock holdings for ABK clients. Five accounts remain with stock holdings that cannot be liquidated.

***Star Scientific***

Star Scientific is a private company located in Australia. Star Scientific shares were held in custodial accounts, IRA and trusts. Originally, Star was held in accounts as part of multiple LLCs that held the underlying investment in Star.<sup>1</sup> STC also purchased certificates with large numbers of shares where clients would purchase a portion of the certificate. The LLCs later converted to shares with certificates titled “Summit Trust Company FBO...”, but the shares sold by Summit did not.

STC made an effort beginning in 2018 to transfer and distribute the shares to STC clients. After reconciliation, review of available documentation, confirmation directly with Star Scientific and transfer and distribution of accounts, there are currently 57 custodial accounts and 38 IRA accounts. There are 14,419 shares owned by clients that were a part of the original STC certificate and 9,370 shares held on individual certificates. The STC certificates held a reconciled balance of 13,884 shares not attributable to client accounts that were sold for \$7.50 per share.

***MMI Asset Management Group, LLC & Ayokunno Are***

Ayokunno Are and MMI Asset Management Group, LLC sold promissory notes to individuals to be held in both custodial accounts and IRAs with MMI as the borrower and either the individual or the IRA as the lender. The loans are all in default and it is not clear if interest or any principal was ever returned to the accounts. The available STC records had thirteen custody accounts and 14 IRAs open. Mr. Are stated that certain accounts were no longer open per the client.

Although there is no mention of any underlying investment, Mr. Are has asserted that the promissory notes relate to an underlying investment in Walton Roll-Up Corporation.<sup>2</sup> Mr. Are

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<sup>1</sup> Star did not sell certificates with small numbers of shares to individuals when STC clients began investing in the company.

<sup>2</sup> The available STC documents do not have any information showing an underlying investment with Walton.

contacted STC on June 16, 2021.<sup>3</sup> Mr. Are stated that Walton was making a distribution and that funds were available to the note holders.<sup>4</sup>

Mr. Are provided funds<sup>5</sup> for custodial accounts and certain IRA accounts for the clients. Funds and notes were distributed or transferred for all except three accounts.

***Accounts with Non-liquid Holdings***

The available STC records indicate that STC holds 62 accounts, eight custodial accounts and fifty-four IRAs, which hold only non-liquid assets and no cash. The accounts hold one or more of the following:

- Annuity
- Broker Portfolio
- Common, preferred and/or private stock
- Hedge fund
- Insurance policy
- LLC
- LP
- Mineral interests
- Mortgage
- Mutual fund
- Various types of promissory notes
- REIT
- Real estate

It is unknown if all of the holdings in the accounts are viable. The current value for the assets is also unknown.

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<sup>3</sup> Mr. Are had no contact with STC since 2019. STC had outdated contact information for Mr. Are. Any contact information found on the internet was unusable.

<sup>4</sup> Walton made the distribution on April 8, 2021. Walton also made a distribution on April 21, 2020, but STC was not contacted regarding funds due to the MMI accounts in 2020.

<sup>5</sup> It is unclear if the funds are dividends or return of principal. STC has not received a written description for the funds received.

# APPENDIX 2

## Securities and Exchange Commission v. Summit Trust Company, et al.

## Final List of all Accounts Considered Open

## Appendix 2

*Note: The final cash balance is the net of fees assessed to locate and contact the account holder.*

Account Number	Account Holdings	Account Type	Open Account Category	Account Name	Final Cash Balance
xxxx31	NOTES	CUSTODY	Non-liquid Holdings	L B Custody	-
xxxx74	CASH ONLY	IRA	Cash & Other Assets	C A IRA	22,988.17
xxxx83	INS POLICY	CUSTODY	Non-liquid Holdings	C E I 401k Plan	-
xxxx84	CASH ONLY	IRA	Cash - Treasury Bonds	D H IRA	41,737.36
xxxx88	CASH ONLY	IRA	Cash - Treasury Bonds	K M IRA	1,777.73
xxxx01	PRIVATE STOCK	IRA	Non-liquid Holdings	F S IRA	-
xxxx18	STAR	IRA	Star Scientific Stock	K A. N IRA	-
xxxx25	STAR	CUSTODY	Star Scientific Stock	J D M dba J D P LLC	-
xxxx56	STAR	IRA	Star Scientific Stock	K Z. N Roth IRA	-
xxxx19	CASH ONLY	IRA	Cash - Treasury Bonds	D P IRA	8,513.64
xxxx25	CASH ONLY	IRA	Cash & Other Assets	J A IRA	1,216.48
xxxx56	STAR	IRA	Star Scientific Stock	L B IRA	-
xxxx80	STAR	CUSTODY	Star Scientific Stock	M T Custody	-
xxxx84	CASH ONLY	TRUST	Trusts	K B Trust	28,260.00
xxxx16	STAR	IRA	Star Scientific Stock	K D Roth IRA	-
xxxx17	STAR	IRA	Star Scientific Stock	L E. D Roth IRA	-
xxxx71	RIGHTS	CUSTODY	Non-liquid Holdings	M G F Custody	-
xxxx95	STAR	IRA	Star Scientific Stock	K J IRA	-
xxxx04	STAR	IRA	Star Scientific Stock	D L. S IRA	-
xxxx77	CASH ONLY/STOP	IRA	Cash & Other Assets	R A. D IRA	7,915.25
xxxx01	CASH ONLY/STOP	IRA	Cash & Other Assets	J W IRA	1,066.22
xxxx06	CASH ONLY/STOP	IRA	Cash & Other Assets	M T IRA	500.01
xxxx24	CASH ONLY	CUSTODY	Cash - DFA	M S SEP fbo S B	57,866.22
xxxx29	CASH ONLY	IRA	Cash - Treasury Bonds	B B IRA	5,523.93
xxxx59	PRIVATE NOTE	IRA	MMI	O I IRA - Deceased	-
xxxx85	STAR/LLC	IRA	Star Scientific Stock	S A. R Roth IRA	-
xxxx23	CASH ONLY	CUSTODY	Cash - DFA	P B fbo S J. B IM	11,570.85
xxxx25	RIGHTS	CUSTODY	Non-liquid Holdings	S B IRA (mixed)	-
xxxx34	STAR	IRA	Star Scientific Stock	L A. H Roth IRA	-
xxxx44	STAR	IRA	Star Scientific Stock	L C W IRA	(0.01)

## Securities and Exchange Commission v. Summit Trust Company, et al.

## Final List of all Accounts Considered Open

## Appendix 2

*Note: The final cash balance is the net of fees assessed to locate and contact the account holder.*

Account Number	Account Holdings	Account Type	Open Account Category	Account Name	Final Cash Balance
xxxx78	PRIVATE NOTE	IRA	MMI	D M IRA	(0.07)
xxxx96	STAR	IRA	Star Scientific Stock	D L S IRA	(14.94)
xxxx73	PRIVATE NOTE	CUSTODY	MMI	C. D M Custody	-
xxxx05	CASH ONLY/STOP PMT	CUSTODY	Cash & Other Assets	E G Trust Custody Account	918.94
xxxx14	NOTE	IRA	Non-liquid Holdings	K J Roth IRA	-
xxxx15	LLC	IRA	Non-liquid Holdings	B D IRA	-
xxxx18	STAR	IRA	Star Scientific Stock	E C. J Roth IRA	-
xxxx64	LP	CUSTODY	Non-liquid Holdings	T V I Inc. PSP Custody	-
xxxx67	LLC	IRA	Non-liquid Holdings	M C IRA	(198.11)
xxxx86	PRIVATE STOCK	IRA	Non-liquid Holdings	J P IRA	-
xxxx08	STAR	IRA	Star Scientific Stock	B B Roth IRA	-
xxxx21	STAR	IRA	Star Scientific Stock	A L Roth IRA	-
xxxx22	STAR	IRA	Star Scientific Stock	F L Roth IRA	-
xxxx40	STAR	CUSTODY	Star Scientific Stock	G D LLC	-
xxxx47	STAR	CUSTODY	Star Scientific Stock	G M Custody	-
xxxx71	STAR	CUSTODY	Star Scientific Stock	J B Custody	-
xxxx77	STAR	CUSTODY	Star Scientific Stock	P W. J	-
xxxx79	STAR	CUSTODY	Star Scientific Stock	L D F	-
xxxx96	STAR	IRA	Star Scientific Stock	S I Roth IRA	-
xxxx97	STAR	IRA	Star Scientific Stock	L B Roth IRA	-
xxxx99	STAR	IRA	Star Scientific Stock	J H Roth IRA	-
xxxx06	STAR	IRA	Star Scientific Stock	S G. M Roth IRA	-
xxxx07	STAR	CUSTODY	Star Scientific Stock	K K LLC Custody	-
xxxx35	STAR	CUSTODY	Star Scientific Stock	D M Custody	-
xxxx37	STAR	CUSTODY	Star Scientific Stock	A S III Custody	-
xxxx38	STAR	IRA	Star Scientific Stock	M S Roth IRA	-
xxxx40	STAR	IRA	Star Scientific Stock	C C Roth IRA	-
xxxx59	STAR	IRA	Star Scientific Stock	D T IRA	-
xxxx61	STAR	IRA	Star Scientific Stock	L C Roth Ira	-
xxxx65	STAR	CUSTODY	Star Scientific Stock	N A D Custody	-



## Securities and Exchange Commission v. Summit Trust Company, et al.

## Final List of all Accounts Considered Open

## Appendix 2

*Note: The final cash balance is the net of fees assessed to locate and contact the account holder.*

Account Number	Account Holdings	Account Type	Open Account Category	Account Name	Final Cash Balance
xxxx74	STAR	CUSTODY	Star Scientific Stock	F S T O	-
xxxx85	STAR	CUSTODY	Star Scientific Stock	W T to F I C Cust.	-
xxxx87	STAR	IRA	Star Scientific Stock	R A. M IRA	-
xxxx89	STAR	CUSTODY	Star Scientific Stock	D F and J F JTWROS	-
xxxx32	STAR	IRA	Star Scientific Stock	C P Roth IRA	-
xxxx37	STAR	IRA	Star Scientific Stock	D K Roth IRA	-
xxxx39	STAR	IRA	Star Scientific Stock	S G Roth IRA	-
xxxx41	STAR	CUSTODY	Star Scientific Stock	E LLC Custody	-
xxxx54	STAR	IRA	Star Scientific Stock	D W Roth IRA	-
xxxx56	STAR	IRA	Star Scientific Stock	S M. T Roth IRA	-
xxxx57	STAR	IRA	Star Scientific Stock	D S. B Roth IRA	-
xxxx61	STAR	CUSTODY	Star Scientific Stock	P LLC Custody	-
xxxx63	STAR	IRA	Star Scientific Stock	B P Roth IRA	-
xxxx64	MINERAL INTERESTS	IRA	Non-liquid Holdings	J W Roth IRA	-
xxxx67	STAR	IRA	Star Scientific Stock	D L. J Roth IRA	-
xxxx73	STAR	CUSTODY	Star Scientific Stock	G B Custody	-
xxxx76	STAR	CUSTODY	Star Scientific Stock	J Y Custody	-
xxxx79	STAR	IRA	Star Scientific Stock	L I Roth IRA	-
xxxx96	STAR	CUSTODY	Star Scientific Stock	P M custody	-
xxxx01	STAR	CUSTODY	Star Scientific Stock	S F Custody	-
xxxx22	STAR	CUSTODY	Star Scientific Stock	M V L T Custody	-
xxxx29	STAR	IRA	Star Scientific Stock	B E. S Roth IRA	-
xxxx30	STAR	CUSTODY	Star Scientific Stock	B D. & B E. S Living Trust	-
xxxx34	STAR	CUSTODY	Star Scientific Stock	M A. A	-
xxxx38	STAR	CUSTODY	Star Scientific Stock	J and C G JTWROS	-
xxxx47	REAL ESTATE	IRA	Non-liquid Holdings	P W IRA Inv. Mgmt.	-
xxxx66	STAR	CUSTODY	Star Scientific Stock	W J. D	-
xxxx71	STAR	CUSTODY	Star Scientific Stock	W C. H Jr. and D I JTWROS	-
xxxx79	STAR	CUSTODY	Star Scientific Stock	M G. E	-
xxxx85	STAR	CUSTODY	Star Scientific Stock	M R Custody	-

## Securities and Exchange Commission v. Summit Trust Company, et al.

## Final List of all Accounts Considered Open

## Appendix 2

*Note: The final cash balance is the net of fees assessed to locate and contact the account holder.*

Account Number	Account Holdings	Account Type	Open Account Category	Account Name	Final Cash Balance
xxxx87	STAR	CUSTODY	Star Scientific Stock	J and L H	-
xxxx05	STAR	CUSTODY	Star Scientific Stock	J A. R	-
xxxx06	STAR	CUSTODY	Star Scientific Stock	L A and W A	-
xxxx09	STAR	CUSTODY	Star Scientific Stock	J J	-
xxxx11	STAR	IRA	Star Scientific Stock	T K Roth IRA	-
xxxx15	STAR	CUSTODY	Star Scientific Stock	D F custody	-
xxxx16	STAR	CUSTODY	Star Scientific Stock	D L custody	-
xxxx20	STAR	CUSTODY	Star Scientific Stock	M B Custody	-
xxxx30	STAR	CUSTODY	Star Scientific Stock	M B. C	-
xxxx31	STAR	IRA	Star Scientific Stock	M C Roth IRA	-
xxxx34	STAR	CUSTODY	Star Scientific Stock	C R Trust	-
xxxx38	STAR	CUSTODY	Star Scientific Stock	J B Custody	-
xxxx45	STAR	IRA	Star Scientific Stock	A B Roth IRA	-
xxxx52	STAR	CUSTODY	Star Scientific Stock	B B Custody	-
xxxx54	STAR	IRA	Star Scientific Stock	J B Roth IRA	-
xxxx67	STAR	CUSTODY	Star Scientific Stock	J & J K JTWROS	-
xxxx68	STAR	CUSTODY	Star Scientific Stock	M & L P JTWROS	-
xxxx74	STAR	CUSTODY	Star Scientific Stock	B B Custody	-
xxxx75	STAR	CUSTODY	Star Scientific Stock	D T Custody	-
xxxx76	STAR	CUSTODY	Star Scientific Stock	L B Custody	-
xxxx02	STAR	CUSTODY	Star Scientific Stock	G S Custody	-
xxxx11	STAR	CUSTODY	Star Scientific Stock	S. E & K. D Custody	-
xxxx28	STAR	CUSTODY	Star Scientific Stock	M L	-
xxxx48	STAR	CUSTODY	Star Scientific Stock	C D Custody	-
xxxx66	STAR	CUSTODY	Star Scientific Stock	C R Custody	-
xxxx81	STAR	CUSTODY	Star Scientific Stock	G B Custody	-
xxxx53	COMMON STOCK	IRA	Non-liquid Holdings	Dr. M M IRA	-
xxxx56	STAR	CUSTODY	Star Scientific Stock	T O Custody	-
xxxx18	COMMON STOCK	IRA	Non-liquid Holdings	K L IRA	-
xxxx31	PRIVATE STOCK	IRA	Non-liquid Holdings	E P Roth IRA	-

## Securities and Exchange Commission v. Summit Trust Company, et al.

## Final List of all Accounts Considered Open

## Appendix 2

*Note: The final cash balance is the net of fees assessed to locate and contact the account holder.*

Account Number	Account Holdings	Account Type	Open Account Category	Account Name	Final Cash Balance
xxxx34	STAR	CUSTODY	Star Scientific Stock	K F. S	-
xxxx60	CASH / PRIVATE	IRA	Unation / High Street	P J IRA	14,729.41
xxxx21	STAR	CUSTODY	Star Scientific Stock	H F, LLC Custody	-
xxxx68	NOTE	IRA	Non-liquid Holdings	J B Roth IRA	-
xxxx69	STAR	CUSTODY	Star Scientific Stock	H P Custody	-
xxxx70	STAR	CUSTODY	Star Scientific Stock	M P Custody	-
xxxx82	COMMON STOCK	IRA	Non-liquid Holdings	M D L G IRA	(97.65)
xxxx83	COMMON STOCK	IRA	Non-liquid Holdings	M D L G Roth IRA	(47.73)
xxxx21	STAR	CUSTODY	Star Scientific Stock	B R F Custody	-
xxxx57	COMMON STOCK	IRA	Non-liquid Holdings	S Q IRA	-
xxxx83	NOTE	IRA	Non-liquid Holdings	N B IRA	-
xxxx06	MORTGAGE	CUSTODY	Non-liquid Holdings	L E, LLC (Escrow) Custody	-
xxxx51	REIT	IRA	Non-liquid Holdings	M Y H IRA	-
xxxx91	STAR	CUSTODY	Star Scientific Stock	M H Custody	-
xxxx15	COMMON STOCK	CUSTODY	ABK	A C fbo I G Ltd.	-
xxxx78	LLC	IRA	Non-liquid Holdings	C M. S INH IRA (R C. O IRA - deceased)	-
xxxx78	LLC	IRA	Non-liquid Holdings	K O INH IRA (R C. O IRA - deceased)	-
xxxx78	LLC	IRA	Non-liquid Holdings	C M. G INH IRA (R C. O IRA - deceased)	-
xxxx78	LLC	IRA	Non-liquid Holdings	J M. O INH IRA (R C. O IRA - deceased)	-
xxxx83	PRIVATE STOCK	IRA	Non-liquid Holdings	K M. O IRA	-
xxxx87	COMMON STOCK	IRA	Non-liquid Holdings	H L. W Roth IRA	-
xxxx88	STOCK/HEDGE FUND	IRA	Non-liquid Holdings	W D W Roth IRA	-
xxxx92	CASH ONLY	IRA	Cash & Other Assets	M R. F IRA	14,644.82
xxxx63	COMMON STOCK	CUSTODY	ABK	A C fbo J I, Inc.	-
xxxx95	COMMON STOCK	CUSTODY	ABK	A C fbo K P	-
xxxx08	LLC	IRA	Non-liquid Holdings	D I IRA	(208.88)
xxxx27	COMMON STOCK	CUSTODY	ABK	A C fbo S U	-
xxxx85	LLC	IRA	Non-liquid Holdings	S L. C IRA	-
xxxx17	LLC	IRA	Non-liquid Holdings	R P. D IRA	-
xxxx80	LLC	IRA	Non-liquid Holdings	M K Traditional IRA	-

## Securities and Exchange Commission v. Summit Trust Company, et al.

## Final List of all Accounts Considered Open

## Appendix 2

*Note: The final cash balance is the net of fees assessed to locate and contact the account holder.*

Account Number	Account Holdings	Account Type	Open Account Category	Account Name	Final Cash Balance
xxxx91	CASH ONLY	Custody	Cash & Other Assets	Y D. H. Custody	3,139.72
xxxx73	COMMON STOCK	CUSTODY	ABK	Summit Trust fbo V of R - T K	-
xxxx84	PRIVATE NOTE	IRA	Unation / High Street	Z B IRA	-
xxxx85	PRIVATE NOTE	IRA	Unation / High Street	J L. B IRA	-
xxxx07	PRIVATE STOCK/PRIVATE NOTE	IRA	Unation / High Street	T W Rollover IRA	-
xxxx43	NOTE	IRA	Non-liquid Holdings	G P P Inherited IRA	(82.78)
xxxx90	CASH ONLY/STOP PMT	CUSTODY	Cash & Other Assets	S C Custody	12,451.23
xxxx43	HEDGE FUND	IRA	Non-liquid Holdings	C L P Jr. IRA	-
xxxx45	PREFERRED STOCK	IRA	Non-liquid Holdings	S A. L Roth IRA	-
xxxx35	MUTUAL FUND	IRA	Non-liquid Holdings	F B Roth IRA	-
XXX-xxxx04	LLC	IRA	Non-liquid Holdings	S T Roth IRA	(0.02)
XXX-xxxx06	LLC	IRA	Non-liquid Holdings	J S IRA	-
XXX-xxxx07	LLC	IRA	Non-liquid Holdings	M T Roth IRA	(55.65)
XXX-xxxx17	LP	IRA	Non-liquid Holdings	B P IRA	-
XXX-xxxx20	REIT	IRA	Non-liquid Holdings	J P IRA	-
XXX-xxxx25	LLC	IRA	Non-liquid Holdings	E A-O Roth IRA	-
XXX-xxxx36	LP / LLC	IRA	Non-liquid Holdings	G B IRA	-
XXX-xxxx39	CASH ONLY	IRA	Cash & Other Assets	B J D IRA	20,223.21
XXX-xxxx51	REIT	IRA	Non-liquid Holdings	R F IRA	-
XXX-xxxx55	LP	IRA	Non-liquid Holdings	D B IRA	-
XXX-xxxx61	REIT	CUSTODY	Non-liquid Holdings	B F D C 401(k) PSP	-
XXX-xxxx91	CASH/KBS?	IRA	Cash & Other Assets	S A. G Roth IRA	2,794.33
XXX-xxxx98	LP	IRA	Non-liquid Holdings	K C IRA	-
XXX-xxxx17	CASH ONLY	IRA	Cash & Other Assets	M G IRA	9,563.44
XXX-xxxx18	LP	IRA	Non-liquid Holdings	L P IRA	-
XXX-xxxx20	REIT	IRA	Non-liquid Holdings	H T IRA	(113.80)
XXX-xxxx13	CASH ONLY	IRA	Cash & Other Assets	P H. A IRA	501.11
XXX-xxxx01	LLC	IRA	Non-liquid Holdings	T N IRA	-
XXX-xxxx02	LLC	IRA	Non-liquid Holdings	J N IRA	-
XXX-xxxx25	CASH / REIT	IRA	Cash & Other Assets	L S, III Roth IRA	661.71

## Securities and Exchange Commission v. Summit Trust Company, et al.

## Final List of all Accounts Considered Open

## Appendix 2

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Account Number	Account Holdings	Account Type	Open Account Category	Account Name	Final Cash Balance
XXX-xxxx56	CASH ONLY	IRA	Cash & Other Assets	T L IRA	644.04
XXX-xxxx02	REIT	IRA	Non-liquid Holdings	L B IRA	-
XXX-xxxx05	BROKER PORTFOLIO	IRA	Non-liquid Holdings	B B IRA	-
XXX-xxxx06	CASH / LP	IRA	Cash & Other Assets	C C IRA	3,067.72
XXX-xxxx10	REIT	IRA	Non-liquid Holdings	T S IRA	-
XXX-xxxx13	REIT	IRA	Non-liquid Holdings	C E. B IRA	-
XXX-xxxx14	LP/REIT	IRA	Non-liquid Holdings	J B IRA	-
XXX-xxxx16	REIT	IRA	Non-liquid Holdings	H A IRA	-
XXX-xxxx23	REIT	IRA	Non-liquid Holdings	A Y IRA	-
XXX-xxxx69	REIT	IRA	Non-liquid Holdings	K H IRA	-
XXX-xxxx72	CASH / MUTUAL FUND	IRA	Cash & Other Assets	S T IRA	15,664.27
XXX-xxxx03	ANNUITY	CUSTODY	Non-liquid Holdings	I 401(k) Plan	-
XXX-xxxx13	CASH ONLY	IRA	Cash & Other Assets	A R IRA	1,003.60
XXX-xxxx64	CASH ONLY	IRA	Cash & Other Assets	K S IRA	989.92
XXX-xxxx87	CASH ONLY	IRA	Cash & Other Assets	J P IRA	485.03
XXX-xxxx38	LLC	IRA	Non-liquid Holdings	P P IRA	(62.17)
XXX-xxxx41	CASH / LLC	IRA	Cash & Other Assets	F P Roth IRA	255.94
<b>Net Cash Balance</b>					<b>\$ 289,792.50</b>
<b>Distributable Cash Balance</b>					<b>\$ 290,674.31</b>
<b>Number of Accounts</b>					<b>197</b>

# EXHIBIT A

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SECURITIES AND EXCHANGE	)	Civil Action No: 15-cv-05843-JCJ
COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
SUMMIT TRUST COMPANY,	)	
RAMPART CAPITAL MANAGEMENT,	)	
LLC, TRUST COUNSELORS	)	
NETWORK, INC., BROWN	)	
INVESTMENT ADVISORS, INC.	)	
KEVIN C. BROWN, and GEORGE P.	)	
BROWN,	)	
	)	
Defendants,	)	
	)	
and	)	
	)	
RAMPART FUND LP, WEALTH	)	
MAINTENANCE ORGANIZATION,	)	
LLC, and HODDINOTT FARM	)	
DEVELOPMENT, LLC,	)	
	)	
Relief Defendants.	)	

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**ORDER APPOINTING RECEIVER**

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**WHEREAS** this matter has come before this Court upon the unopposed motion of Plaintiff U.S. Securities and Exchange Commission ("SEC", "Commission" or "Plaintiff") to appoint a receiver in the above-captioned action; and,

**WHEREAS** Defendants Summit Trust Company ("STC") and Trust Counselors Network, Inc. ("TCN") and Relief Defendant Rampart Fund LP ("Rampart Fund") consented

and agreed to the appointment of a Receiver over their respective assets with the powers and authority set forth below, without admitting or denying the allegations in the Complaint filed herein, except to the jurisdiction of this Court;

**WHEREAS** the Court finds that, based on the record in these proceedings, the appointment of a receiver in this action is necessary and appropriate for the purposes of marshaling and preserving all assets of STC, TCN, and Rampart Fund, including all assets held by, under the control of, or to which STC, TCN, and Rampart Fund have rights; and

**WHEREAS** this Court has subject matter jurisdiction over this action and personal jurisdiction over STC, TCN, and Rampart Fund, and venue properly lies in this district.

**NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:**

1. This Court hereby takes exclusive jurisdiction and possession of the assets, of whatever kind and wherever situated, of STC, TCN, and Rampart Fund (collectively, the "Receivership Parties"), including those assets held by, under the control of, or to which STC, TCN, and Rampart Fund have rights.

2. Until further Order of this Court, Ricardo J. Zayas is hereby appointed to serve without bond as receiver (the "Receiver") for the respective receivership estates of the Receivership Parties.

## **II. General Powers and Duties of Receiver**

3. The Receiver shall have all powers, authorities, rights and privileges heretofore possessed by the officers, directors, managers and general and limited partners of the Receivership Parties under applicable state and federal law, by the governing charters, by-laws, articles and/or agreements in addition to all powers and authority of a receiver at equity, and all



powers conferred upon a receiver by the provisions of 28 U.S.C. §§ 754, 959 and 1692, and Fed.R.Civ.P. 66.

4. The trustees, directors, officers, managers, employees, investment advisers, accountants, attorneys and other agents of the Receivership Parties are hereby suspended, pending reinstatement at the discretion of the Receiver. Such persons and entities shall have no authority with respect to the operations or assets of the Receivership Parties, except to the extent as may hereafter be expressly granted by the Receiver including, but not limited to, pursuant to paragraph 6.F. below. The Receiver shall assume, manage, and control the operations of the Receivership Parties and shall pursue and preserve all of their claims.

5. No person holding or claiming any position of any sort with the Receivership Parties shall possess any authority to act by or on behalf of the Receivership Parties, except to the extent as may hereafter be expressly granted by the Receiver.

6. Subject to the specific provisions in Sections III through XIV, below, the Receiver shall have the following general powers and duties:

- A. To use reasonable efforts to determine the nature, location and value of all property interests of the Receivership Parties or property or accounts over which the Receivership Parties act as a fiduciary, trustee, or charitable organization, including, but not limited to, monies, funds, annuities, securities, credits, effects, goods, chattels, lands, premises, leases, claims, judgments, rights, custodial accounts, alternative investments, and other assets, together with all rents, profits, dividends, interest or other income attributable thereto, of whatever kind, which the Receivership Parties own, possess, have a beneficial interest in, control, or act as a trustee, fiduciary or charitable organization, directly or indirectly ("Receivership Property" or, collectively, the "Receivership Estates");
- B. To take custody, control and possession of all Receivership Property and records relevant thereto from the Receivership Parties; to sue for and collect, recover, receive and take into possession from third parties all Receivership Property and records relevant thereto;

- C. To manage, control, operate and maintain the Receivership Estates and hold in his possession, custody and control all Receivership Property, pending further Order of this Court;
- D. To use Receivership Property for the benefit of the Receivership Estates, making payments and disbursements and incurring expenses as may be necessary or advisable in the ordinary course of business in discharging his duties as Receiver;
- E. To take any action which, prior to the entry of this Order, could have been taken by the officers, directors, partners, managers, trustees and agents of the Receivership Parties;
- F. To continue to engage or engage and employ persons in the Receiver's discretion to assist the Receiver in carrying out his duties and responsibilities hereunder, including, but not limited to, accountants, attorneys, securities traders, registered representatives, financial or business advisers, liquidating agents, real estate agents, forensic experts, brokers, traders or auctioneers;
- G. To take such action as necessary and appropriate for the preservation of Receivership Property or to prevent the dissipation or concealment of Receivership Property;
- H. The Receiver is authorized to issue subpoenas for documents and testimony consistent with the Federal Rules of Civil Procedure;
- I. To bring or continue such legal actions based on law or equity in any state, federal, or foreign court as the Receiver deems necessary or appropriate in discharging his duties as Receiver;
- J. To pursue, resist and defend all suits, actions, claims and demands which may now be pending or which may be brought by or asserted against each Receivership Estate; and,
- K. To take such other action as may be approved by this Court.

### **III. Access to Information**

7. The Receivership Parties and the past and/or present officers, directors, agents, third-party contractors, managers, general and limited partners, trustees, attorneys, accountants and employees of the Receivership Parties, as well as those acting in their place, are hereby

ordered and directed to preserve and turn over and/or make available at the premises of the Receivership Parties to the Receiver forthwith all paper and electronic information of, and/or relating to, the Receivership Parties and/or all Receivership Property; such information shall include but not be limited to books, records, documents, accounts and all other instruments and papers.

8. Within fifteen (15) days of the entry of this Order, each Receivership Party shall file with the Court and serve upon the Receiver and the Commission a statement, listing: (a) the identity, location and estimated value of all known Receivership Property; (b) all employees (and job titles thereof), other personnel, attorneys, accountants and any other agents or contractors of the Receivership Party; and, (c) the names, addresses and amounts of claims of all known creditors of the Receivership Party.

9. Within forty-five (45) days of the entry of this Order, each Receivership Party shall file with the Court and serve upon the Receiver and the Commission a statement and accounting, with supporting documentation, covering the period from January 1, 2008 to the present:

- A. Of all investor funds received by the Receivership Party in any way related, directly or indirectly, to the conduct alleged in the Commission's Complaint. The submission must clearly identify, among other things: (1) the identity of the investors; (2) the securities and/or investments (including all investment vehicles offered by TCN) they purchased; (3) the date and amount of their investments; (4) the disposition of such funds; (5) the amount of earnings or principal paid to each investor (including the date of such payments); and (6) the current location of such funds;
- B. Of every account at every bank, brokerage or other financial institution: (a) over which each Receivership Party has signatory authority; and (b) opened by, in the name of, or for the benefit of, or used by, the Receivership Party;
- C. Of all credit, bank, charge, debit or other deferred payment card issued to

or used by the Receivership Party, including but not limited to the issuing institution, the card or account number(s), all persons or entities to which a card was issued and/or with authority to use a card, the balance of each account and/or card as of the most recent billing statement, and all statements for the last twelve months;

10. Within thirty (30) days of the entry of this Order, each Receivership Party shall provide to the Receiver and the Commission copies of the Receivership Party's federal income tax returns for 2008 through 2014 with all relevant and necessary underlying documentation.

11. The Receivership Parties' past and/or present officers, directors, agents, third-party contractors, attorneys, managers, shareholders, employees, accountants, debtors, creditors, managers and general and limited partners, and other appropriate persons or entities shall answer under oath to the Receiver or any of his designees all questions which the Receiver may put to them and produce all documents as required by the Receiver regarding the businesses of the Receivership Parties, or any other matter relevant to the operation or administration of the receivership or the collection of funds due to the Receivership Parties. In the event that the Receiver deems it necessary to require the appearance of the aforementioned persons or entities, the Receiver shall make its discovery requests in accordance with the Federal Rules of Civil Procedure.

12. The Receiver shall have the power to issue subpoenas to compel testimony of persons or production of records, consistent with the Federal Rules of Civil Procedure and applicable Local Rules, except for the provisions of Fed.R.Civ.P. 26(d)(1), concerning any subject matter within the powers and duties granted by this Order.

13. The Receivership Parties are required to assist the Receiver in fulfilling the Receiver's duties and obligations. As such, they must respond promptly and truthfully to all requests for information and documents from the Receiver.

**IV. Access to Books, Records and Accounts**

14. As of the date of this Order, the Receiver is deemed to have possession of all assets, bank accounts or other financial accounts, books and records and all other documents or instruments relating to the Receivership Parties. All persons and entities having control, custody or possession of any Receivership Property are hereby directed to turn such property over to the Receiver or, in the case of fiduciary or trust accounts, provide control over such property to the Receiver.

15. The Receivership Parties, as well as their agents, servants, employees, third-party contractors, attorneys, any persons acting for or on behalf of the Receivership Parties, and any persons receiving notice of this Order by personal service, facsimile transmission or otherwise, having possession of the property, business, books, records, accounts or assets of the Receivership Parties are hereby directed to deliver the same to the Receiver, his agents and/or employees.

16. All banks, brokerage firms, financial institutions, and other persons or entities which have possession, custody or control of any assets or funds held by, in the name of, or for the benefit of, directly or indirectly, and of the Receivership Parties that receive actual notice of this Order by personal service, facsimile transmission or otherwise shall:

- A. Not liquidate, transfer, sell, convey or otherwise transfer any assets, securities, funds, annuities, or accounts in the name of or for the benefit of a Receivership Party except upon instructions from the Receiver;
- B. Not exercise any form of set-off, alleged set-off, lien, or any form of self-help whatsoever, or refuse to transfer any funds or assets to the Receiver's control without the permission of this Court;
- C. Within five (5) business days of receipt of that notice, file with the Court and serve on the Receiver and counsel for the Commission a certified statement setting forth, with respect to each such account or other asset,

the balance in the account or description of the assets as of the close of business on the date of receipt of the notice; and,

- D. Cooperate expeditiously in providing information and transferring funds, assets and accounts to the Receiver or at the direction of the Receiver.

**V. Access to Real and Personal Property**

17. As of the date of this Order, the Receiver is deemed to have possession of all personal property of the Receivership Parties, wherever located, including but not limited to electronically stored information, computers, laptops, hard drives, external storage drives, and any other such memory, media or electronic storage devices, books, papers, data processing records, evidence of indebtedness, bank records and accounts, savings records and accounts, brokerage records and accounts, certificates of deposit, stocks, bonds, debentures, and other securities and investments, contracts, mortgages, furniture, office supplies and equipment.

18. As of the date of this Order, the Receiver is deemed to have possession of all real property of the Receivership Parties, wherever located, including but not limited to all ownership and leasehold interests and fixtures. Upon receiving actual notice of this Order by personal service, facsimile transmission or otherwise, all persons other than law enforcement officials acting within the course and scope of their official duties, are (without the express written permission of the Receiver) prohibited from: (a) entering such premises; (b) removing anything from such premises; or, (c) destroying, concealing or erasing anything on such premises.

19. In order to execute the express and implied terms of this Order, the Receiver is authorized to change door locks to the premises described above. The Receiver shall have exclusive control of the keys. The Receivership Parties, or any other person acting or purporting to act on their behalf, are ordered not to change the locks in any manner, nor to have duplicate keys made, nor shall they have keys in their possession during the term of the receivership,

unless so authorized by the Receiver or the Court.

20. The Receiver is authorized to open all mail directed to or received by or at the offices or post office boxes of the Receivership Parties, and to inspect all mail opened prior to the entry of this Order, to determine whether items or information therein fall within the mandates of this Order, excluding mail that is clearly personal mail of individuals.

21. Upon the request of the Receiver, the United States Marshal Service, in any judicial district, is hereby ordered to assist the Receiver in carrying out the Receiver's duties to take possession, custody and control of, or identify the location of, any assets, records or other materials belonging to each Receivership Estate.

#### **VI. Notice to Third Parties**

22. The Receiver shall promptly give notice of the Receiver's appointment to all known officers, directors, agents, employees, shareholders, creditors, debtors, managers, third-party contractors, and general and limited partners of the Receivership Parties, as the Receiver deems necessary or advisable to effectuate the operation of the receivership.

23. All persons and entities owing any obligation, debt, or distribution with respect to an ownership interest to the Receivership Parties shall, until further ordered by this Court, pay all such obligations in accordance with the terms thereof to the Receiver and his receipt for such payments shall have the same force and effect as if the Receivership Parties had received such payment.

24. In furtherance of his responsibilities in this matter, the Receiver is authorized to communicate with, and/or serve this Order upon, any person, entity or government office that he deems appropriate to inform them of the status of this matter and/or the financial condition of the Receivership Estates. All government offices which maintain public files of security interests in



real and personal property shall, consistent with such office's applicable procedures, record this Order upon the request of the Receiver or the SEC.

25. The Receiver is authorized to instruct the United States Postmaster to hold and/or reroute mail which is related, directly or indirectly, to the business, operations or activities of the Receivership Parties (the "Receiver's Mail"), including all mail addressed to, or for the benefit of, the Receivership Parties. The Postmaster shall not comply with, and shall immediately report to the Receiver, any change of address or other instruction given by anyone other than the Receiver concerning the Receiver's Mail. The Receivership Parties shall not open any of the Receiver's Mail and shall immediately turn over such mail, regardless of when received, to the Receiver. All personal mail and/or any mail appearing to contain privileged information, and/or any mail not falling within the mandate of the Receiver, shall be released to the named addressee by the Receiver. The foregoing instructions shall apply to any proprietor, whether individual or entity, of any private mail box, depository, business or service, or mail courier or delivery service, hired, rented or used by the Receivership Parties. The Receivership Parties shall not open a new mailbox, or take any steps or make any arrangements to receive mail in contravention of this Order, whether through the U.S. mail, a private mail depository or courier service.

26. Subject to payment for services provided, any entity furnishing water, electric, telephone, sewage, garbage or trash removal services to the Receivership Parties shall maintain such service and transfer any such accounts to the Receiver unless instructed to the contrary by the Receiver.



**VII. Injunction Against Interference with Receiver**

27. The Receivership Parties and all persons receiving notice of this Order by personal service, facsimile or otherwise, are hereby restrained and enjoined from directly or indirectly taking any action or causing any action to be taken, without the express written agreement of the Receiver, which would:

- A. Interfere with the Receiver's efforts to take control, possession, or management of any Receivership Property; such prohibited actions include but are not limited to, using self-help or executing or issuing or causing the execution or issuance of any court attachment, subpoena, replevin, execution, or other process for the purpose of impounding or taking possession of or interfering with or creating or enforcing a lien upon any Receivership Property;
- B. Hinder, obstruct or otherwise interfere with the Receiver in the performance of his duties; such prohibited actions include but are not limited to, concealing, destroying or altering records or information;
- C. Dissipate or otherwise diminish the value of any Receivership Property; such prohibited actions include but are not limited to, releasing claims or disposing, transferring, exchanging, assigning or in any way conveying any Receivership Property, enforcing judgments, assessments or claims against any Receivership Property or the Receivership Parties, attempting to modify, cancel, terminate, call, extinguish, revoke or accelerate (the due date), of any lease, loan, mortgage, indebtedness, security agreement or other agreement executed by the Receivership Parties or which otherwise affects any Receivership Property; or,
- D. Interfere with or harass the Receiver, or interfere in any manner with the exclusive jurisdiction of this Court over the Receivership Estates.

28. The Receivership Parties shall cooperate with and assist the Receiver in the performance of the Receiver's duties.

29. The Receiver shall promptly notify the Court and SEC counsel of any failure or apparent failure of any person or entity to comply in any way with the terms of this Order.

### **VIII. Stay of Litigation**

30. As set forth in detail below, the following proceedings, excluding the instant proceeding and all police or regulatory actions and actions of the Commission related to the above-captioned enforcement action, are stayed until further Order of this Court:

All civil legal proceedings of any nature, including, but not limited to, bankruptcy proceedings, arbitration proceedings, foreclosure actions, default proceedings, or other actions of any nature involving: (a) the Receiver, in his capacity as Receiver; (b) any Receivership Property, wherever located; (c) the Receivership Parties, including subsidiaries and partnerships and related or affiliated unincorporated entities; or (d) any of the Receivership Parties' past or present officers, directors, managers, agents, or general or limited partners sued for, or in connection with, any action taken by them while acting in such capacity of any nature, whether as plaintiff, defendant, third-party plaintiff, third-party defendant, or otherwise (such proceedings are hereinafter referred to as "Ancillary Proceedings").

31. The parties to any and all Ancillary Proceedings are enjoined from commencing or continuing any such legal proceeding, or from taking any action, in connection with any such proceeding, including, but not limited to, the issuance or employment of process.

32. All Ancillary Proceedings are stayed in their entirety, and all Courts having any jurisdiction thereof are enjoined from taking or permitting any action until further Order of this Court. Further, as to a cause of action accrued or accruing in favor of the Receivership Parties against a third person or party, any applicable statute of limitation is tolled during the period in which this injunction against commencement of legal proceedings is in effect as to that cause of action.

### **IX. Managing Assets**

33. For each of the Receivership Estates, the Receiver shall establish one or more custodial accounts at a federally insured bank to receive and hold all cash equivalent Receivership Property (the "Receivership Funds").

34. With the name of the action, the Receiver's deposit accounts shall be entitled: (1) "Receiver's Account, Estate of Summit Trust"; (2) "Receiver's Account, Estate of Trust Counselors Network, Inc."; and (3) "Receiver's Account, Estate of Rampart Fund LP."

35. The Receiver may, without further Order of this Court, transfer, compromise, or otherwise dispose of any Receivership Property, other than real estate, in the ordinary course of business, on terms and in the manner the Receiver deems most beneficial to the Receivership Estates, and with due regard to the realization of the true and proper value of such Receivership Property.

36. Subject to Paragraph 37, immediately below, the Receiver is authorized to locate, list for sale or lease, engage a broker for sale or lease, cause the sale or lease, and take all necessary and reasonable actions to cause the sale or lease of all real property in the Receivership Estates, either at public or private sale, on terms and in the manner the Receiver deems most beneficial to the Receivership Estates, and with due regard to the realization of the true and proper value of such real property.

37. Upon further Order of this Court, pursuant to such procedures as may be required by this Court and additional authority such as 28 U.S.C. §§ 2001 and 2004, the Receiver will be authorized to sell, and transfer clear title to, all real property in the Receivership Estates.

38. The Receiver is authorized to take all actions to manage, maintain, and/or wind-down business operations of the Receivership Estates, including making legally required payments to creditors, employees, and agents of the Receivership Estates and communicating with vendors, investors, annuitants, governmental and regulatory authorities, and others, as appropriate and choose, engage, and employ attorneys, accountants, appraisers, investigators and other independent contractors and technical specialists as the Receiver deems advisable or

necessary in the performance of the Receiver's duties hereunder.

39. The Receiver shall take all necessary steps to enable the Receivership Funds to obtain and maintain the status of a taxable "Settlement Fund," within the meaning of Section 468B of the Internal Revenue Code and of the regulations, when applicable, whether proposed, temporary or final, or pronouncements thereunder, including the filing of the elections and statements contemplated by those provisions. The Receiver shall be designated the administrator of each Settlement Fund, pursuant to Treas. Reg. § 1.468B-2(k)(3)(i), and shall satisfy the administrative requirements imposed by Treas. Reg. § 1.468B-2, including but not limited to (a) obtaining a taxpayer identification number, (b) timely filing applicable federal, state, and local tax returns and paying taxes reported thereon, and (c) satisfying any information, reporting or withholding requirements imposed on distributions from the Settlement Fund. The Receiver shall cause each Settlement Fund to pay taxes in a manner consistent with treatment of the Settlement Fund as a "Qualified Settlement Fund." The Receivership Parties shall cooperate with the Receiver in fulfilling the Settlement Funds' obligations under Treas. Reg. § 1.468B-2.

#### **X. Investigate and Prosecute Claims**

40. Subject to the requirement in Section VII, above, that leave of this Court is required to resume or commence certain litigation, the Receiver is authorized, empowered and directed to investigate, prosecute, defend, intervene in or otherwise participate in, compromise, and/or adjust actions in any state, federal or foreign court or proceeding of any kind as may in his discretion, and in consultation with SEC counsel, be advisable or proper to recover and/or conserve Receivership Property.

41. Subject to the Receiver's obligation to expend receivership funds in a reasonable and cost-effective manner, the Receiver is authorized, empowered and directed to investigate the

manner in which the financial and business affairs of the Receivership Parties were conducted and (after obtaining leave of this Court) to institute such actions and legal proceedings, for the benefit and on behalf of the Receivership Estate, as the Receiver deems necessary and appropriate; the Receiver may seek, among other legal and equitable relief, the imposition of constructive trusts, disgorgement of profits, asset turnover, avoidance of fraudulent transfers, rescission and restitution, collection of debts, and such other relief from this Court as may be necessary to enforce this Order. Where appropriate, the Receiver should provide prior notice to Counsel for the Commission before commencing investigations and/or actions.

42. The Receiver hereby holds, and is therefore empowered to waive, all privileges, including the attorney-client privilege, held by the Receivership Parties.

43. The Receiver has a continuing duty to ensure that there are no conflicts of interest between the Receiver, the Receiver's Retained Personnel (as that term is defined below), and the Receivership Estates.

## **XII. Bankruptcy Filing**

44. The Receiver may seek authorization of this Court to file voluntary petitions for relief under Title 11 of the United States Code (the "Bankruptcy Code") for the Receivership Parties. If a Receivership Party is placed in bankruptcy proceedings, the Receiver may become, and may be empowered to operate each of the Receivership Estates as, a debtor in possession. In such a situation, the Receiver shall have all of the powers and duties as provided a debtor in possession under the Bankruptcy Code to the exclusion of any other person or entity. Pursuant to Paragraph 3 above, the Receiver is vested with management authority for the Receivership Parties and may therefore file and manage a Chapter 11 petition.

45. The provisions of Section VIII above bar any person or entity, other than the

Receiver, from placing the Receivership Parties in bankruptcy proceedings.

## **XII. Liability of Receiver**

46. Until further Order of this Court, the Receiver shall not be required to post bond or give an undertaking of any type in connection with the Receiver's fiduciary obligations in this matter.

47. The Receiver and his agents, acting within scope of such agency ("Retained Personnel") are entitled to rely on all outstanding rules of law and Orders of this Court and shall not be liable to anyone for their own good faith compliance with any order, rule, law, judgment, or decree. In no event shall the Receiver or Retained Personnel be liable to anyone for their good faith compliance with their duties and responsibilities as Receiver or Retained Personnel, nor shall the Receiver or Retained Personnel be liable to anyone for any actions taken or omitted by them except upon a finding by this Court that they acted or failed to act as a result of malfeasance, bad faith, gross negligence, or in reckless disregard of their duties.

48. This Court shall retain jurisdiction over any action filed against the Receiver or Retained Personnel based upon acts or omissions committed in their representative capacities.

49. In the event the Receiver decides to resign, the Receiver shall first give written notice to the Commission's counsel of record and the Court of its intention, and the resignation shall not be effective until the Court appoints a successor. The Receiver shall then follow such instructions as the Court may provide.

## **XIII. Recommendations and Reports**

50. The Receiver is authorized, empowered and directed to develop a plan for the fair, reasonable, and efficient recovery of all remaining, recovered, and recoverable Receivership Property for each Receivership Estate (the "Receivership Plans"). Each Receivership Plan shall

include a recommendation as to whether or how the Receivership Property should be liquidated and/or distributed. Each Receivership Plan shall be subject to Court approval.

51. Within ninety (90) days of the entry date of this Order, the Receiver shall file the Receivership Plans in the above-captioned action, with service copies to counsel of record.

52. Within thirty (30) days after the end of each calendar quarter, the Receiver shall file and serve a full report and accounting of each Receivership Estate (the "Quarterly Status Report"), reflecting (to the best of the Receiver's knowledge as of the period covered by the report) the existence, value, and location of all Receivership Property, and of the extent of liabilities, both those claimed to exist by others and those the Receiver believes to be legal obligations of the Receivership Estates.

53. The Quarterly Status Report shall contain the following:

- A. A summary of the operations of the Receiver;
- B. The amount of cash on hand, the amount and nature of accrued administrative expenses, and the amount of unencumbered funds in each Receivership Estate;
- C. A schedule of all the Receiver's receipts and disbursements (attached as Exhibit A to the Quarterly Status Report), with one column for the quarterly period covered and a second column for the entire duration of the receivership;
- D. A description of all known Receivership Property for each Receivership Estate, including approximate or actual valuations, anticipated or proposed dispositions, and reasons for retaining assets where no disposition is intended;
- E. A description of liquidated and unliquidated claims held by each Receivership Estate, including the need for forensic and/or investigatory resources; approximate valuations of claims; and anticipated or proposed methods of enforcing such claims (including likelihood of success in: (i) reducing the claims to judgment; and, (ii) collecting such judgments);
- F. A list of all known creditors with their addresses and the amounts of their



claims;

G. The status of Creditor Claims Proceedings, after such proceedings have been commenced; and,

H. The Receiver's recommendations for a continuation or discontinuation of the receivership and the reasons for the recommendations.

54. On the request of the Commission, the Receiver shall provide the Commission with any documentation that the Commission deems necessary to meet his reporting requirements, that is mandated by statute or Congress, or that is otherwise necessary to further the Commission's mission.

#### **XIV. Fees, Expenses and Accountings**

55. Subject to Paragraphs 56 – 62 below, the Receiver need not obtain Court approval prior to the disbursement of Receivership Funds for expenses in the ordinary course of the administration and operation of each Receivership Estate. Further, prior Court approval is not required for payments of applicable federal, state or local taxes.

56. Subject to Paragraph 57 immediately below, the Receiver is authorized to solicit persons and entities ("Retained Personnel") to assist the Receiver in carrying out the duties and responsibilities described in this Order. Such anticipated Retained Personnel and their rates must be included as an attachment to Exhibit 1 to this Order (i.e., the "Billing Instructions"), as described in Paragraph 57 below.

57. The Receiver and Retained Personnel are entitled to reasonable compensation and expense reimbursement from each Receivership Estate for work performed on each Receivership Estate as described in the "Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission" (the "Billing Instructions"), attached as Exhibit 1, agreed to by the Receiver. Such compensation shall require the prior approval of the Court as



described below.

58. Within forty-five (45) days after the end of each calendar quarter, the Receiver and Retained Personnel shall apply to the Court for compensation and expense reimbursement from the Receivership Estates (the "Quarterly Fee Applications"). At least thirty (30) days prior to filing each Quarterly Fee Application with the Court, the Receiver will serve upon counsel for the SEC a complete copy of the proposed Quarterly Fee Application, together with all exhibits and relevant billing information in a format to be provided by SEC staff.

59. All Quarterly Fee Applications will be interim and will be subject to cost benefit and final reviews at the close of the receivership. At the close of the receivership, the Receiver will file a final fee application, describing in detail the costs and benefits associated with all litigation and other actions pursued by the Receiver during the course of the receivership.

60. Quarterly Fee Applications may be subject to a holdback in the amount of 20% of the amount of fees and expenses for each application filed with the Court. The total amounts held back during the course of the receivership will be paid out at the discretion of the Court as part of the final fee application submitted at the close of the receivership.

61. Each Quarterly Fee Application shall:

- A. Comply with the terms of the Billing Instructions agreed to by the Receiver; and,
- B. Contain representations (in addition to the Certification required by the Billing Instructions) that: (i) the fees and expenses included therein were incurred in the best interests of the Receivership Estates; and, (ii) with the exception of the Billing Instructions, the Receiver has not entered into any agreement, written or oral, express or implied, with any person or entity concerning the amount of compensation paid or to be paid from the Receivership Estates, or any sharing thereof.

62. At the close of the receivership, the Receiver shall submit a Final Accounting, in a format to be provided by SEC staff, as well as the Receiver's final application for compensation and expense reimbursement.

IT IS SO ORDERED, this 24<sup>th</sup> day of November, 2015

  
UNITED STATES DISTRICT JUDGE

# EXHIBIT B-1

United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust

Production Partner: Ricardo Zayas

U.S. Magistrate Judge Philadelphia, PA 19106

Main Client Name: United States District Court - Summit Trust

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
7/7/2020	Patrick Rogers	Accounting and Auditing	Compliance Services Tax deadline extension / QuickBooks review	0.50	\$275.00	\$137.50
7/8/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	0.50	\$275.00	\$137.50
7/9/2020	Patrick Rogers	Accounting and Auditing	1120SF and 1120 Compliance Services Tax extension and e-file roll	2.00	\$275.00	\$550.00
7/10/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	0.30	\$275.00	\$82.50
7/13/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	0.50	\$275.00	\$137.50
7/14/2020	Patrick Rogers	Accounting and Auditing	Tax Compliance Services	1.50	\$275.00	\$412.50
7/15/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	0.50	\$275.00	\$137.50
9/17/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	1.00	\$275.00	\$275.00
9/21/2020	Patrick Rogers	Accounting and Auditing	Compliance Services tax prep	2.00	\$275.00	\$550.00
9/22/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	2.00	\$275.00	\$550.00
9/23/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	1.75	\$275.00	\$481.25
9/24/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	2.00	\$275.00	\$550.00
9/25/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	1.00	\$275.00	\$275.00
9/28/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	1.00	\$275.00	\$275.00
10/9/2020	Patrick Rogers	Accounting and Auditing	Tax Compliance Services	4.00	\$275.00	\$1,100.00
10/13/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	2.00	\$275.00	\$550.00
10/14/2020	Patrick Rogers	Accounting and Auditing	Compliance Services Summit Trust CO 1120, Rampart QSF, TCN QSF, STC QSF. Tax returns and QB analysis/adjustments	6.00	\$275.00	\$1,650.00
10/15/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	2.75	\$275.00	\$756.25
10/27/2020	Christopher J. Jud	Accounting and Auditing	Compliance Services	2.50	\$260.00	\$650.00
11/18/2020	Christopher J. Jud	Accounting and Auditing	Compliance Services - calls w/ Nicole & RJ Back office regarding liquidation of Summit A/C	1.00	\$260.00	\$260.00
11/24/2020	Christopher J. Jud	Accounting and Auditing	Compliance Services - liquidation of remaining bonds for Summit Trust	1.00	\$260.00	\$260.00
12/9/2020	Christopher J. Jud	Accounting and Auditing	Compliance Services - liquidation of Summit Mutual Funds	1.00	\$260.00	\$260.00
12/10/2020	Christopher J. Jud	Accounting and Auditing	Compliance Services - liquidation of worthless Summit securities	0.50	\$260.00	\$130.00
12/15/2020	Christopher J. Jud	Accounting and Auditing	Compliance Services - calls w/ RJ Trading & Nicole; RE Worthless Securities	0.50	\$260.00	\$130.00
1/13/2021	Christopher J. Jud	Accounting and Auditing	Liquidation of Assets / Star Email w/ R. Zayas (Summit)	0.50	\$260.00	\$130.00
1/14/2021	Carrie Goodman	Accounting and Auditing	1099s	1.25	\$175.00	\$218.75
1/27/2021	Carrie Goodman	Accounting and Auditing	1099s	0.25	\$175.00	\$43.75
1/27/2021	Korah Sabu	Accounting and Auditing	1099 Prep from Tax Dept. Multiple issues with data file. Contact with IT and multiple calls to process 1099-R.	1.00	\$145.00	\$145.00
1/28/2021	Korah Sabu	Accounting and Auditing	1099	0.75	\$145.00	\$108.75
1/29/2021	Korah Sabu	Accounting and Auditing	1099	0.25	\$145.00	\$36.25
2/18/2021	Korah Sabu	Accounting and Auditing	Call with IT. 1099 Amendment. Had to amend each individual 1099 (64 total).	1.50	\$145.00	\$217.50
2/19/2021	Carrie Goodman	Accounting and Auditing	1099s	0.75	\$175.00	\$131.25
2/19/2021	Korah Sabu	Accounting and Auditing	1099 Amendment - Talking with IT after Nicole's changes	0.50	\$145.00	\$72.50
3/19/2021	Patrick Rogers	Accounting and Auditing	Compliance Services	0.50	\$275.00	\$137.50
4/2/2021	Carrie Goodman	Accounting and Auditing	1099s	0.25	\$175.00	\$43.75

United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust

Production Partner: Ricardo Zayas

U.S. Magistrate Judge Philadelphia, PA 19106

Main Client Name: United States District Court - Summit Trust

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
4/2/2021	Kaeleigh Kapr	Accounting and Auditing	Edit 1099 information	0.50	\$80.00	\$40.00
4/2/2021	Korah Sabu	Accounting and Auditing	Finishing 1099	0.75	\$145.00	\$108.75
4/5/2021	Carrie Goodman	Accounting and Auditing	1099s	0.25	\$175.00	\$43.75
4/5/2021	Carrie Goodman	Accounting and Auditing	1099s	-0.25	\$175.00	-\$43.75
4/13/2021	Carrie Goodman	Accounting and Auditing	1099 corrected issues	0.50	\$175.00	\$87.50
4/15/2021	Patrick Rogers	Accounting and Auditing	Compliance Services	2.00	\$275.00	\$550.00
4/22/2021	Patrick Rogers	Accounting and Auditing	Compliance Services	2.50	\$275.00	\$687.50
4/30/2021	Patrick Rogers	Accounting and Auditing	Compliance Services	2.75	\$275.00	\$756.25
1/30/2021	Kati L Allison-Boughton	Asset Analysis and Recovery	Research for addresses, phone, emails and confirmation of DOD	2.15	\$290.00	\$623.50
7/1/2020	Nicole Donecker	Business Operations	Review of fee app	0.30	\$290.00	\$87.00
7/1/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance	0.40	\$360.00	\$144.00
7/2/2020	Nicole Donecker	Business Operations	Preparation of trust resignation letters; preparation of document to deliver to new trustee	0.80	\$290.00	\$232.00
7/2/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance	0.80	\$360.00	\$288.00
7/7/2020	Nicole Donecker	Business Operations	Transfer of accounts; phone consult with STC client	0.50	\$290.00	\$145.00
7/8/2020	Nicole Donecker	Business Operations	Review of vendor payments and outstanding payables	0.30	\$290.00	\$87.00
7/9/2020	Nicole Donecker	Business Operations	Preparation of trust resignation letters	3.40	\$290.00	\$986.00
7/10/2020	Nicole Donecker	Business Operations	Preparation of trust resignation letters; review of open client accounts	6.30	\$290.00	\$1,827.00
7/13/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance	0.20	\$360.00	\$72.00
7/14/2020	Nicole Donecker	Business Operations	Preparation of documents requested by SEC; review of accounts for closure and preparation of contact with clients	2.20	\$290.00	\$638.00
7/15/2020	Nicole Donecker	Business Operations	Preparation of trust resignation letters; preparation of account transfers; preparation of account closures and distributions	6.40	\$290.00	\$1,856.00
7/15/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance	0.50	\$360.00	\$180.00
7/17/2020	Nicole Donecker	Business Operations	Phone Consultation with trust company to transfer trusts; phone consult with STC client; preparation of email to ACTC re: status of client account	0.50	\$290.00	\$145.00
7/21/2020	Nicole Donecker	Business Operations	Preparation of account transfers and closures; review of client accounts	1.40	\$290.00	\$406.00
7/21/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; DFA reconciliation; closing order; Avalon follow-up	1.45	\$360.00	\$522.00
7/22/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; communicate with Leaver	0.20	\$360.00	\$72.00
7/23/2020	Nicole Donecker	Business Operations	Review of fee apps and draft orders; download bank statements; review and research of client accounts	3.50	\$290.00	\$1,015.00
7/23/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; telecon Leaver; research DFA accounts; closing issues	2.50	\$360.00	\$900.00
7/24/2020	Nicole Donecker	Business Operations	Update of QuickBooks; research and review of accounts to closures; review of cash balances in accounts	3.00	\$290.00	\$870.00
7/27/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; telecon Burr firm re: Christy	0.25	\$360.00	\$90.00
7/28/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance	0.50	\$360.00	\$180.00

United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust  
U.S. Magistrate Judge Philadelphia, PA 19106

Production Partner: Ricardo Zayas

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Main Client Name: United States District Court - Summit Trust

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
8/5/2020	Nicole Donecker	Business Operations	Review of account transfers; review of mail; review of correspondence with Unation/High Street; review of client accounts	1.90	\$290.00	\$551.00
8/6/2020	Nicole Donecker	Business Operations	Retrieval of documents from storage unit; review of accounts to close; preparation of transmittal letter to transfer documents	4.00	\$290.00	\$1,160.00
8/6/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance	0.20	\$360.00	\$72.00
8/7/2020	Nicole Donecker	Business Operations	Review of accounts to be closed; preparation of list of cash distributions to clients; review of Dominion Financial documents to deliver to government	7.90	\$290.00	\$2,291.00
8/7/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance	1.50	\$360.00	\$540.00
8/12/2020	Nicole Donecker	Business Operations	Review of fee applications; review of accounts for closure; preparation of communication investment issuer	1.10	\$290.00	\$319.00
8/12/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; closing issues; unration	1.75	\$360.00	\$630.00
8/13/2020	Nicole Donecker	Business Operations	Phone Consultation - call with STC client re: transfer of account	0.30	\$290.00	\$87.00
8/13/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; Unation issues and Misc	0.60	\$360.00	\$216.00
8/13/2020	Nicole Donecker	Business Operations	Review of email to Unation/High Street; preparation of email and statement to STC client; review of accounts for closure	1.00	\$290.00	\$290.00
8/14/2020	Nicole Donecker	Business Operations	Review of accounts to be closed; preparation of list of cash distributions to clients; meeting with R. Zayas re: account closures and fees	5.40	\$290.00	\$1,566.00
8/14/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; closing issues	0.75	\$360.00	\$270.00
8/18/2020	Nicole Donecker	Business Operations	Preparation of client accounts for closure; preparation of response to Unation/High Street; preparation of distribution letters	1.50	\$290.00	\$435.00
8/19/2020	Nicole Donecker	Business Operations	Review of transfer documents; review of client accounts; preparation of schedule of accounts to close; reconciliation of client account	4.00	\$290.00	\$1,160.00
8/19/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance	1.10	\$360.00	\$396.00
8/20/2020	Nicole Donecker	Business Operations	Preparation of disbursements and closure of accounts; phone consult with J. Bartoletta and R. Zayas re: closure and transfer of accounts; preparation of accounting closing correspondence	7.50	\$290.00	\$2,175.00
8/20/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; telecon Bartoletta; review DFA; close selected accounts; research dormant accounts	2.60	\$360.00	\$936.00
8/21/2020	Nicole Donecker	Business Operations	Preparation of disbursements and closure of accounts; preparation of accounting closing correspondence	4.40	\$290.00	\$1,276.00
8/25/2020	Christopher J. Jud	Business Operations	Research & Transfer Work regarding FSK	1.50	\$290.00	\$435.00

United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust

Production Partner: Ricardo Zayas

U.S. Magistrate Judge Philadelphia, PA 19106

Main Client Name: United States District Court - Summit Trust

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
8/25/2020	Nicole Donecker	Business Operations	Preparation of account transfer; review of client assets; contact clients with account closures; preparation of documents for property transfers from accounts; phone consult with C. Jud re: assets in RJ account; general business operations	3.00	\$290.00	\$870.00
8/25/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; execute documents for STC clients; review DFA accounts	1.30	\$360.00	\$468.00
8/26/2020	Nicole Donecker	Business Operations	Preparation of closure of accounts; reconciliation of client account; respond to STC client inquiries	1.90	\$290.00	\$551.00
8/27/2020	Nicole Donecker	Business Operations	Preparation of account closures and disbursements; review of client accounts; contact with account holders	3.00	\$290.00	\$870.00
8/27/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; Hoddinott banking; telecon McGarrigle; review Unation status	1.00	\$360.00	\$360.00
8/28/2020	Nicole Donecker	Business Operations	Preparation of account closures and disbursements; review of client accounts; contact with account holders	5.70	\$290.00	\$1,653.00
9/1/2020	Nicole Donecker	Business Operations	Preparation of client account closures and transfers; phone consult with clients; phone consult with potential new trustee	3.20	\$290.00	\$928.00
9/2/2020	Nicole Donecker	Business Operations	Review of accounts for closure; preparation of disbursements of accounts; phone consult with STC clients; preparation of vendor payment	3.00	\$290.00	\$870.00
9/2/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; Hoddinott Returns	0.50	\$360.00	\$180.00
9/8/2020	Nicole Donecker	Business Operations	Reconciliation of client account; review of client account	0.60	\$290.00	\$174.00
9/8/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance	0.25	\$360.00	\$90.00
9/9/2020	Nicole Donecker	Business Operations	Phone consult with STC clients; research of client accounts; closure of accounts; reconcile of client account; update QuickBooks	4.50	\$290.00	\$1,305.00
9/9/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; research DFA accounts; review storage issues.	3.20	\$360.00	\$1,152.00
9/10/2020	Nicole Donecker	Business Operations	Preparation of client account closures and distributions; phone consult with STC clients and advisors; research of client accounts; reconciliation of client account	3.40	\$290.00	\$986.00
9/10/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; communicate with DFA clients; letters; closing orders	0.60	\$360.00	\$216.00
9/11/2020	Nicole Donecker	Business Operations	Preparation of closure and distribution of accounts; phone consult with STC clients	2.20	\$290.00	\$638.00
9/11/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; revise order language; review NMC situation; DFA letters	0.75	\$360.00	\$270.00
9/14/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; revise orders	0.90	\$360.00	\$324.00
9/15/2020	Nicole Donecker	Business Operations	Review and reconciliation of client account; phone consult with clients and custodians; research of client accounts	1.60	\$290.00	\$464.00
9/15/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; revise orders; Pacira research; telecon Krepto	1.45	\$360.00	\$522.00



United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust

Production Partner: Ricardo Zayas

U.S. Magistrate Judge Philadelphia, PA 19106

Main Client Name: United States District Court - Summit Trust

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
9/16/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; property sale docs; McKenna DFA account	0.30	\$360.00	\$108.00
9/17/2020	Nicole Donecker	Business Operations	Preparation of account distribution and closures; review and research of STC client accounts; phone consult with client	3.40	\$290.00	\$986.00
9/17/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; DFA accounts	0.65	\$360.00	\$234.00
9/18/2020	Nicole Donecker	Business Operations	Preparation of account closures and distributions; research of account holdings; research of client accounts; respond to STC client inquiries	4.10	\$290.00	\$1,189.00
9/22/2020	Nicole Donecker	Business Operations	Preparation of account closures and distributions; review of assets for retitling; review of client investment holdings; review of client accounts	6.10	\$290.00	\$1,769.00
9/22/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; revise orders; DFA issues	0.70	\$360.00	\$252.00
9/23/2020	Nicole Donecker	Business Operations	Clean out of STC / TCN storage unit; research of STC client account	1.30	\$290.00	\$377.00
9/23/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; telecon Haines re: Cristy Trust	0.25	\$360.00	\$90.00
9/24/2020	Nicole Donecker	Business Operations	Preparation of client account closures and disbursement; reconciliation of client account; phone consult with clients and advisors; research of client accounts	4.00	\$290.00	\$1,160.00
9/24/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; Pacira stock issue; research closing issues	1.20	\$360.00	\$432.00
9/24/2020	Nicole Donecker	Business Operations	Preparation of payment to vendors; review of outstanding fee applications	1.25	\$290.00	\$362.50
9/25/2020	Nicole Donecker	Business Operations	Reconciliation of client account; review and research of client accounts; phone consult with client advisors	0.70	\$290.00	\$203.00
9/29/2020	Nicole Donecker	Business Operations	Preparation of transfer paperwork for STC client assets; reconciliation of client account	1.30	\$290.00	\$377.00
9/29/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; address Cristy trust issues	0.25	\$360.00	\$90.00
9/30/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; DFA issues; search for clients	0.70	\$360.00	\$252.00
10/1/2020	Nicole Donecker	Business Operations	Phone Consultation with D. Park, P. Durrant and R. Zayas re: update of receivership	0.30	\$290.00	\$87.00
10/1/2020	Nicole Donecker	Business Operations	Reconciliation of client account; phone consult with client advisors	1.00	\$290.00	\$290.00
10/1/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; closing issues; telecon Park ACTC	0.60	\$360.00	\$216.00
10/2/2020	Nicole Donecker	Business Operations	Preparation of account closures and disbursements; reconciliation of client account; research of client accounts	2.30	\$290.00	\$667.00
10/6/2020	Nicole Donecker	Business Operations	Preparation of account distributions; reconciliation of client account; review of client accounts; phone consult with STC client	1.70	\$290.00	\$493.00



United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust

Production Partner: Ricardo Zayas

U.S. Magistrate Judge Philadelphia, PA 19106

Main Client Name: United States District Court - Summit Trust

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
10/7/2020	Nicole Donecker	Business Operations	Preparation of account distributions and closures; preparation of contact letters to open accounts; reconciliation of client account	2.30	\$290.00	\$667.00
10/8/2020	Nicole Donecker	Business Operations	Review of client accounts; preparation of open account list; contact of clients re: open accounts	1.20	\$290.00	\$348.00
10/8/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance	0.20	\$360.00	\$72.00
10/9/2020	Nicole Donecker	Business Operations	Preparation of account closures and distributions; reconciliation of client account; preparation of open account for SEC; review and research of client accounts	4.75	\$290.00	\$1,377.50
10/12/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance	0.10	\$360.00	\$36.00
10/13/2020	Nicole Donecker	Business Operations	Reconciliation of client account; preparation of cash on hand and securities analysis; preparation of account transfers and closures	4.10	\$290.00	\$1,189.00
10/13/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance	0.30	\$360.00	\$108.00
10/13/2020	Nicole Donecker	Business Operations	Phone consult with Delaware Funds re: close account; preparation of letter of instruction	1.20	\$290.00	\$348.00
10/14/2020	Nicole Donecker	Business Operations	Reconcile client account	0.10	\$290.00	\$29.00
10/15/2020	Nicole Donecker	Business Operations	Review of Diversified Financing promissory notes	1.25	\$290.00	\$362.50
10/16/2020	Nicole Donecker	Business Operations	Client account reconciliation; close and transfer accounts	1.30	\$290.00	\$377.00
10/16/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; review closing issues with Krepto	0.75	\$360.00	\$270.00
10/16/2020	Ricardo Zayas	Business Operations	Review NCM document request	0.30	\$360.00	\$108.00
10/20/2020	Nicole Donecker	Business Operations	SUMMIT 10125702 - Research of client account; reconciliation of client bank account	0.90	\$290.00	\$261.00
10/21/2020	Nicole Donecker	Business Operations	SUMMIT 10125702 - Identification of client documents; review of investments; preparation of open account list for SEC; phone consult with new custodian	1.40	\$290.00	\$406.00
10/22/2020	Nicole Donecker	Business Operations	SUMMIT 10125702 - Preparation of open account list for SEC; research of client held assets	4.10	\$290.00	\$1,189.00
10/22/2020	Ricardo Zayas	Business Operations	Review and respond to TD inquiry (STC)	0.20	\$360.00	\$72.00
10/23/2020	Ricardo Zayas	Business Operations	Review (STC)	0.20	\$360.00	\$72.00
10/23/2020	Nicole Donecker	Business Operations	SUMMIT 10125702 - Preparation of open account list for SEC; research of client account; preparation of account transfers	4.10	\$290.00	\$1,189.00
10/26/2020	Ricardo Zayas	Business Operations	Review Cristy engagement letter.	0.10	\$360.00	\$36.00
10/27/2020	Ricardo Zayas	Business Operations	Review Cristy retention letter	0.40	\$360.00	\$144.00
10/27/2020	Nicole Donecker	Business Operations	SUMMIT 10125702 - Preparation of open account to transfer to SEC; preparation of account transfers; research of accounts; research of assets	2.10	\$290.00	\$609.00
10/28/2020	Nicole Donecker	Business Operations	SUMMIT 10125702 - Preparation of open account list for SEC; review and research client accounts	4.00	\$290.00	\$1,160.00
10/28/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; closing issues	0.50	\$360.00	\$180.00
10/29/2020	Nicole Donecker	Business Operations	Preparation of account transfers and distributions; review and research of client accounts	2.70	\$290.00	\$783.00

United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust

Production Partner: Ricardo Zayas

U.S. Magistrate Judge Philadelphia, PA 19106

Main Client Name: United States District Court - Summit Trust

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
10/29/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; Star Scientific issues	0.10	\$360.00	\$36.00
10/29/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; viaticals issue	0.10	\$360.00	\$36.00
10/30/2020	Nicole Donecker	Business Operations	Preparation of open account list for SEC; research of client accounts; payment to vendor	3.75	\$290.00	\$1,087.50
11/4/2020	Nicole Donecker	Business Operations	Preparation of account transfers; deposit of funds	0.80	\$290.00	\$232.00
11/4/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; trinity property issue	0.10	\$360.00	\$36.00
11/5/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; Cristy Trust; NC Mutual status	0.20	\$360.00	\$72.00
11/6/2020	Nicole Donecker	Business Operations	Preparation of account transfer and closures; research of client accounts; phone consult with STC client	1.25	\$290.00	\$362.50
11/6/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; Cristy	0.20	\$360.00	\$72.00
11/10/2020	Nicole Donecker	Business Operations	Reconcile client account	0.30	\$290.00	\$87.00
11/10/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance	0.20	\$360.00	\$72.00
11/11/2020	Nicole Donecker	Business Operations	Review of electronic documents to identify prior production; review of draft deposition topics; reconcile client account; update of client investment holdings	4.20	\$290.00	\$1,218.00
11/11/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; telecon Krepto re: North Carolina issue	0.80	\$360.00	\$288.00
11/12/2020	Nicole Donecker	Business Operations	Update of client investment holdings; preparation of schedule instructions for holdings	2.60	\$290.00	\$754.00
11/12/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; Cristy and NCM	0.25	\$360.00	\$90.00
11/13/2020	Nicole Donecker	Business Operations	Preparation of account closure and distribution; preparation of contact to STC clients re: outstanding checks	1.30	\$290.00	\$377.00
11/16/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; telecon Haines re: Cristy	0.25	\$360.00	\$90.00
11/18/2020	Nicole Donecker	Business Operations	STC 10125702 - Preparation of client payment; review of client accounts; reconciliation of client account; phone consult with R. Zayas re: investment holdings; phone consult with C. Jud sale of investment holdings	1.60	\$290.00	\$464.00
11/19/2020	Ricardo Zayas	Business Operations	Review Las Vegas box issue	0.20	\$360.00	\$72.00
11/19/2020	Nicole Donecker	Business Operations	STC 10125702 - Preparation of banking for STC; payment on behalf of STC client; phone consult with Bank of Nevada re: bank box; review of bank box records	1.60	\$290.00	\$464.00
11/20/2020	Ricardo Zayas	Business Operations	Review lock box in NV issue and DFA clients	0.25	\$360.00	\$90.00
11/20/2020	Nicole Donecker	Business Operations	STC 10125702 - Phone consult with STC client; research of STC client account; preparation of unclaimed property forms	1.10	\$290.00	\$319.00
11/23/2020	Nicole Donecker	Business Operations	STC 10125702 - Phone consult with STC client; research of STC client account; preparation of unclaimed property forms	1.10	\$290.00	\$319.00
11/23/2020	Nicole Donecker	Business Operations	STC 10125702 - Review of client distribution; preparation of correspondence with STC client	-0.85	\$290.00	-\$246.50
11/24/2020	Ricardo Zayas	Business Operations	Review and finalize 2601 documents	0.20	\$360.00	\$72.00

United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust

Production Partner: Ricardo Zayas

U.S. Magistrate Judge Philadelphia, PA 19106

Main Client Name: United States District Court - Summit Trust

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
11/24/2020	Nicole Donecker	Business Operations	STC 10125702 - Preparation of correspondence with STC Clients	0.20	\$290.00	\$58.00
12/1/2020	Ricardo Zayas	Business Operations	Review viatical issue (STC)	0.20	\$360.00	\$72.00
12/1/2020	Nicole Donecker	Business Operations	STC 10125702 - Reconciliation of client account; preparation of client distributions; preparation of vendor payment; phone consult with client representative	1.25	\$290.00	\$362.50
12/2/2020	Ricardo Zayas	Business Operations	Review NMC issue; telecon Williams Mullen (STC)	0.50	\$360.00	\$180.00
12/2/2020	Nicole Donecker	Business Operations	STC 10125702 - Preparation of account distribution and closing; Preparation of mailings to former STC clients; review of client accounts	1.20	\$290.00	\$348.00
12/3/2020	Nicole Donecker	Business Operations	STC 10125702 - review of document; respond to ACTC	0.20	\$290.00	\$58.00
12/8/2020	Nicole Donecker	Business Operations	STC 10125702 - Preparation of package for ACTC; review of client account	0.70	\$290.00	\$203.00
12/10/2020	Ricardo Zayas	Business Operations	Review Star issue	0.20	\$360.00	\$72.00
12/10/2020	Nicole Donecker	Business Operations	STC 10125702 - Review and research of client account (Baylin); review of title change documents for client account	1.75	\$290.00	\$507.50
12/11/2020	Nicole Donecker	Business Operations	STC 10125702 - Preparation of response to ACTC re: Star Scientific	0.60	\$290.00	\$174.00
12/15/2020	Nicole Donecker	Business Operations	STC 10125702 - Review of electronic documents to identify investment holding documentation; phone consult with C. Jud re: available documentation	2.40	\$290.00	\$696.00
1/5/2021	Nicole Donecker	Business Operations	Review of investment account sales and attribute proceeds to proper client accounts; preparation of correspondence to STC clients; phone consult with STC clients	4.80	\$290.00	\$1,392.00
1/6/2021	Nicole Donecker	Business Operations	Preparation of form 1099; general business operations	2.90	\$290.00	\$841.00
1/7/2021	Nicole Donecker	Business Operations	Preparation of account closures and distributions; client account reconciliation	2.60	\$290.00	\$754.00
1/8/2021	Nicole Donecker	Business Operations	Preparation of form 1099; preparation of QuickBooks files; review of bank activity	4.10	\$290.00	\$1,189.00
1/12/2021	Nicole Donecker	Business Operations	Phone consult with client counsel re: transfer of trusts	0.60	\$290.00	\$174.00
1/12/2021	Nicole Donecker	Business Operations	Review and reconciliation of Star Scientific shares; preparation of correspondence re: sale of Star shares; preparation of transfer form; preparation of PA UC correspondence; phone consult with STC client	4.20	\$290.00	\$1,218.00
1/12/2021	Ricardo Zayas	Business Operations	Star documents	0.40	\$360.00	\$144.00
1/13/2021	Nicole Donecker	Business Operations	Preparation of account transfer; phone consult with STC client re: fee payment; preparation of correspondence re: Star Scientific	1.90	\$290.00	\$551.00
1/13/2021	Ricardo Zayas	Business Operations	Star Scientific	0.70	\$360.00	\$252.00
1/14/2021	Nicole Donecker	Business Operations	Preparation of accounts for closure; review and research of client accounts; phone consult with STC clients; preparation of transfer forms; reconciliation of cash	4.00	\$290.00	\$1,160.00

United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust

Production Partner: Ricardo Zayas

U.S. Magistrate Judge Philadelphia, PA 19106

Main Client Name: United States District Court - Summit Trust

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
1/15/2021	Nicole Donecker	Business Operations	Review of accounts to close; phone consult with STC clients; preparation of account transfers; cash reconciliation	1.60	\$290.00	\$464.00
1/19/2021	Nicole Donecker	Business Operations	Phone consult with R. Gordon, B. Theisen and R. Zayas re: Star Scientific stock	0.75	\$290.00	\$217.50
1/19/2021	Ricardo Zayas	Business Operations	Telecon re: disposition of Star Scientific shares	0.75	\$360.00	\$270.00
1/20/2021	Nicole Donecker	Business Operations	Phone consult with STC client	0.10	\$290.00	\$29.00
1/22/2021	Nicole Donecker	Business Operations	Preparation of account closures and distributions; review of account closures; preparation of client correspondence	3.60	\$290.00	\$1,044.00
1/26/2021	Nicole Donecker	Business Operations	Preparation of open account letters; preparation of account transfer; review of SEC documents	3.40	\$290.00	\$986.00
1/26/2021	Ricardo Zayas	Business Operations	Cristy communication; IRS forms 1099	1.10	\$360.00	\$396.00
1/27/2021	Nicole Donecker	Business Operations	Preparation of form 1099; review of SEC motions; preparation of stops payments; reconciliation of bank account; review of open accounts	1.70	\$290.00	\$493.00
1/27/2021	Ricardo Zayas	Business Operations	review order; review Cristy issue	0.65	\$360.00	\$234.00
1/28/2021	Nicole Donecker	Business Operations	Review of form 1099; preparation of email to open accounts; phone consult with STC clients; research of assets	2.90	\$290.00	\$841.00
1/29/2021	Nicole Donecker	Business Operations	Review of form 1099; preparation of client statement; phone consult with STC clients; preparation of list of STC clients for contact information search	2.80	\$290.00	\$812.00
1/30/2021	Nicole Donecker	Business Operations	Payment of vendor	0.30	\$290.00	\$87.00
2/2/2021	Nicole Donecker	Business Operations	Review and preparation of STC client emails; review of Star account holders; phone consult with STC clients	2.00	\$290.00	\$580.00
2/2/2021	Ricardo Zayas	Business Operations	Closing issues	0.25	\$360.00	\$90.00
2/3/2021	Nicole Donecker	Business Operations	Preparation of accounts for closure; reconciliation of bank accounts	1.60	\$290.00	\$464.00
2/3/2021	Ricardo Zayas	Business Operations	Closing issues	0.20	\$360.00	\$72.00
2/4/2021	Nicole Donecker	Business Operations	Preparation of accounts for transfer and closure; phone consult with R. Lopez and R. Zayas re: documents in storage; review of complaint	1.90	\$290.00	\$551.00
2/4/2021	Ricardo Zayas	Business Operations	Closing and LV document destruction	0.70	\$360.00	\$252.00
2/5/2021	Nicole Donecker	Business Operations	Preparation of account closures and transfers; meeting with R. Zayas re: wind down of receivership; phone consult with STC clients	4.60	\$290.00	\$1,334.00
2/5/2021	Ricardo Zayas	Business Operations	Shutdown issues	0.60	\$360.00	\$216.00
2/9/2021	Nicole Donecker	Business Operations	Update of client tracking analyses; review of transfer documents	1.00	\$290.00	\$290.00
2/10/2021	Nicole Donecker	Business Operations	Phone consult with STC clients; preparation of Star transfers; phone consult with advisor; research of client accounts; reconciliation of bank accounts	2.40	\$290.00	\$696.00
2/10/2021	Ricardo Zayas	Business Operations	Star issues; Leinhart issue	0.20	\$360.00	\$72.00
2/11/2021	Nicole Donecker	Business Operations	Preparation of final open account list; reconciliation of cash accounts	4.00	\$290.00	\$1,160.00

United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust

Production Partner: Ricardo Zayas

U.S. Magistrate Judge Philadelphia, PA 19106

Main Client Name: United States District Court - Summit Trust

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
2/11/2021	Ricardo Zayas	Business Operations	closing issue	0.10	\$360.00	\$36.00
2/16/2021	Nicole Donecker	Business Operations	Preparation of available cash analysis; Preparation of final open account list	3.20	\$290.00	\$928.00
2/16/2021	Ricardo Zayas	Business Operations	Closing issues	0.25	\$360.00	\$90.00
2/17/2021	Nicole Donecker	Business Operations	Preparation of final open account list; reconciliation of client account; research of client accounts	5.30	\$290.00	\$1,537.00
2/18/2021	Nicole Donecker	Business Operations	Review and rely to emails from STC clients; update of QuickBooks	0.80	\$290.00	\$232.00
2/19/2021	Nicole Donecker	Business Operations	Preparation of client statement; review of form 1099; preparation of account transfers; phone consult with C. Goodman re: form 1099	2.50	\$290.00	\$725.00
2/23/2021	Ricardo Zayas	Business Operations	Closing issues	0.10	\$360.00	\$36.00
2/23/2021	Nicole Donecker	Business Operations	Preparation of responses to STC clients; research client accounts; review of documents to identify specific documents	2.20	\$290.00	\$638.00
2/24/2021	Ricardo Zayas	Business Operations	Closing issues; Nevada FID; Leaver	0.30	\$360.00	\$108.00
2/25/2021	Ricardo Zayas	Business Operations	review open matters; telecon Lopez re: LV shutdown.	0.85	\$360.00	\$306.00
2/25/2021	Nicole Donecker	Business Operations	Preparation of list of open client accounts; phone consult with R. Zayas and R. Lopez re: storage unit and file retention	2.75	\$290.00	\$797.50
2/26/2021	Ricardo Zayas	Business Operations	Telecon Smith (Nevada FID) re: issues	0.40	\$360.00	\$144.00
2/26/2021	Nicole Donecker	Business Operations	Preparation of list of open client accounts; phone consult with R. Zayas and M. Smith re: STC wind down; preparation of payment of vendor; phone consult with R. Lopez re: files	2.60	\$290.00	\$754.00
3/1/2021	Ricardo Zayas	Business Operations	Prepare inquiry to Nevada FID	0.40	\$360.00	\$144.00
3/2/2021	Nicole Donecker	Business Operations	Review of client accounts; reconciliation of cash accounts; closure and transfer of accounts	2.00	\$290.00	\$580.00
3/2/2021	Ricardo Zayas	Business Operations	Banking and account closings	1.90	\$360.00	\$684.00
3/3/2021	Ricardo Zayas	Business Operations	Star transfers	0.20	\$360.00	\$72.00
3/3/2021	Nicole Donecker	Business Operations	Review of client accounts; preparation of account closures and transfers	2.60	\$290.00	\$754.00
3/4/2021	Ricardo Zayas	Business Operations	Star issues and misc	0.25	\$360.00	\$90.00
3/4/2021	Nicole Donecker	Business Operations	Preparation of account closures and transfers; reconciliation of client cash account	4.80	\$290.00	\$1,392.00
3/5/2021	Ricardo Zayas	Business Operations	telecon Lopez re: LV status; close Hoddinott and Rampart accounts	1.00	\$360.00	\$360.00
3/5/2021	Nicole Donecker	Business Operations	Phone consult with R. Lopez and R. Zayas re: Las Vegas documents; preparation of documents for LV document destruction	1.20	\$290.00	\$348.00
3/10/2021	Nicole Donecker	Business Operations	Preparation of client account transfer; research of client account; preparation of correspondence with PA; preparation of correspondence with Star Scientific	2.50	\$290.00	\$725.00
3/11/2021	Nicole Donecker	Business Operations	Reconciliation of Star Certificate; reconciliation of cash accounts; preparation of correspondence to PAUC	3.00	\$290.00	\$870.00

United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust

Production Partner: Ricardo Zayas

U.S. Magistrate Judge Philadelphia, PA 19106

Main Client Name: United States District Court - Summit Trust

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
3/12/2021	Nicole Donecker	Business Operations	Preparation of correspondence to Star and Unation re: end of receivership; preparation of cash available analysis; update open account list; reconcile cash accounts	3.75	\$290.00	\$1,087.50
3/12/2021	Ricardo Zayas	Business Operations	Communicate with Star and Unation	0.40	\$360.00	\$144.00
3/15/2021	Ricardo Zayas	Business Operations	Review and communicate with Haines re: Cristy; Nevada FID	1.00	\$360.00	\$360.00
3/16/2021	Nicole Donecker	Business Operations	Preparation of account transfers; research of client accounts; update of QuickBooks files; phone consult with R. Zayas re: status of wind down	5.20	\$290.00	\$1,508.00
3/16/2021	Nicole Donecker	Business Operations	Update of QuickBooks	0.50	\$290.00	\$145.00
3/17/2021	Nicole Donecker	Business Operations	Preparation of Star transfer forms; phone consult with STC clients; preparation of payment to vendor	3.00	\$290.00	\$870.00
3/17/2021	Ricardo Zayas	Business Operations	Communicate with Haines re: Cristy; LV documents; MMWR resolution	0.70	\$360.00	\$252.00
3/18/2021	Nicole Donecker	Business Operations	Preparation of correspondence with Star Scientific and former bank; preparation of current cash position; update QuickBooks files; research of client accounts	3.60	\$290.00	\$1,044.00
3/19/2021	Nicole Donecker	Business Operations	Preparation of vendor payments; preparation of open account correspondence; phone consult with R. Zayas and R. Lopez re: LV documents; preparation of correspondence with Star Scientific; correspondence with former client and bank	7.40	\$290.00	\$2,146.00
3/23/2021	Nicole Donecker	Business Operations	Phone consult with R. Zayas re: correspondence and wind down; preparation of correspondence with former client; preparation of vendor payments; research of client account; phone consult with clients	3.25	\$290.00	\$942.50
3/23/2021	Nicole Donecker	Business Operations	Phone consult with R. Zayas re: correspondence and wind down; preparation of correspondence with former client; preparation of vendor payments; research of client account; phone consult with clients	0.75	\$290.00	\$217.50
3/23/2021	Ricardo Zayas	Business Operations	Cristy; Star; misc.	0.60	\$360.00	\$216.00
3/24/2021	Nicole Donecker	Business Operations	Phone consult with STC client; preparation of transaction history to client; review of 1099s; phone consult with R. Zayas and M. Rosenfeld re: Star Scientific	1.30	\$290.00	\$377.00
3/24/2021	Ricardo Zayas	Business Operations	Telecon Rosenfeld re: Star Shares; star transfer	0.90	\$360.00	\$324.00
3/25/2021	Nicole Donecker	Business Operations	Preparation of documents for LV visit; phone consult with R. Zayas and L. Krepto re: wind down extension; phone consult with STC clients	2.30	\$290.00	\$667.00
3/25/2021	Ricardo Zayas	Business Operations	Telecon Krepto; LV status	0.60	\$360.00	\$216.00
3/26/2021	Nicole Donecker	Business Operations	Update cash position; preparation of account distribution; phone consult with P. Durrant status of receivership; phone consult with R. Lopez re: LV status	2.00	\$290.00	\$580.00
3/26/2021	Ricardo Zayas	Business Operations	Telecon Lopez re: LV status	0.20	\$360.00	\$72.00



United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust

Production Partner: Ricardo Zayas

U.S. Magistrate Judge Philadelphia, PA 19106

Main Client Name: United States District Court - Summit Trust

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
3/30/2021	Nicole Donecker	Business Operations	Reconciliation of client account; update client balances; preparation of email to clients and ACTC	0.90	\$290.00	\$261.00
3/30/2021	Ricardo Zayas	Business Operations	Review status; plan for Star shares	0.20	\$360.00	\$72.00
3/31/2021	Nicole Donecker	Business Operations	Preparation of account distribution; reconcile accounts; update distributions; preparation of final Star accounting	2.60	\$290.00	\$754.00
3/31/2021	Ricardo Zayas	Business Operations	Star status	0.25	\$360.00	\$90.00
4/1/2021	Nicole Donecker	Business Operations	Preparation of account transfers; preparation of vendor payments	1.30	\$290.00	\$377.00
4/1/2021	Ricardo Zayas	Business Operations	Review status of closing issues	0.25	\$360.00	\$90.00
4/7/2021	Nicole Donecker	Business Operations	Review of Star Scientific documents; preparation of correspondence to Star Scientific	1.20	\$290.00	\$348.00
4/8/2021	Nicole Donecker	Business Operations	Preparation of account transfer; preparation of Star share reconciliation; phone consult with client advisor	2.20	\$290.00	\$638.00
4/8/2021	Ricardo Zayas	Business Operations	Shutdown issues	0.20	\$360.00	\$72.00
4/9/2021	Nicole Donecker	Business Operations	Preparation of Star reconciliation; research of client accounts; preparation of response to former STC client; reconciliation of bank accounts; phone consult with R. Zayas re: final report	1.60	\$290.00	\$464.00
4/9/2021	Ricardo Zayas	Business Operations	Review closing issues with Donecker	0.50	\$360.00	\$180.00
4/13/2021	Nicole Donecker	Business Operations	Phone consult with client; phone consult with C. Goodman re: 1099; email correspondence with clients	0.50	\$290.00	\$145.00
4/13/2021	Ricardo Zayas	Business Operations	Closing issues; Bontreger	0.30	\$360.00	\$108.00
4/14/2021	Nicole Donecker	Business Operations	Preparation of transfer form; phone consult with clients	0.70	\$290.00	\$203.00
4/14/2021	Ricardo Zayas	Business Operations	Star issues; LV close	0.30	\$360.00	\$108.00
4/15/2021	Nicole Donecker	Business Operations	Phone consult with STC clients	0.30	\$290.00	\$87.00
4/16/2021	Nicole Donecker	Business Operations	Final reconciliation of Star shares; preparation of final report; phone consult with STC clients	3.50	\$290.00	\$1,015.00
4/20/2021	Nicole Donecker	Business Operations	Preparation of final report; preparation of payment to vendor	2.10	\$290.00	\$609.00
4/21/2021	Nicole Donecker	Business Operations	Preparation of files and documents for receivership termination; finalization of open account list	7.50	\$290.00	\$2,175.00
4/22/2021	Nicole Donecker	Business Operations	Preparation of files and documents for receivership termination; finalization of open account list; phone consult with R. Lopez re: remaining files	5.90	\$290.00	\$1,711.00
4/22/2021	Ricardo Zayas	Business Operations	Closing issues; transport documents	0.20	\$360.00	\$72.00
4/23/2021	Nicole Donecker	Business Operations	Phone consult with R. Lopez re: remaining file; phone consult with client	0.40	\$290.00	\$116.00
4/27/2021	Nicole Donecker	Business Operations	Preparation of client correspondence	0.90	\$290.00	\$261.00
4/30/2021	Nicole Donecker	Business Operations	Preparation and payment to vendor	0.50	\$290.00	\$145.00
5/4/2021	Ricardo Zayas	Business Operations	Telecon DiDora re: Olmanoff	0.25	\$360.00	\$90.00
5/5/2021	Nicole Donecker	Business Operations	Review and finalize Star Scientific shareholder list	2.00	\$290.00	\$580.00
5/6/2021	Nicole Donecker	Business Operations	Preparation of email to Star Scientific; review of Star reconciliation; review of client account reconciliation	0.40	\$290.00	\$116.00
5/10/2021	Ricardo Zayas	Business Operations	Communicate Nevada FID	0.20	\$360.00	\$72.00
5/11/2021	Nicole Donecker	Business Operations	Reconciliation of Star Scientific shares	1.50	\$290.00	\$435.00

United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust

Production Partner: Ricardo Zayas

U.S. Magistrate Judge Philadelphia, PA 19106

Main Client Name: United States District Court - Summit Trust

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
5/12/2021	Nicole Donecker	Business Operations	Preparation of payment and correspondence for certified order copy; phone consult with client; preparation of receivership accounting; email with STC client; phone consult with V. Rakosky re: close STC	2.80	\$290.00	\$812.00
5/12/2021	Ricardo Zayas	Business Operations	Telecon Rakowski from Nevada FID re: escheat	0.50	\$360.00	\$180.00
5/13/2021	Nicole Donecker	Business Operations	organization of open account assets and closed account assets; scan of investments files; preparation of correspondence to advisor	4.00	\$290.00	\$1,160.00
5/13/2021	Ricardo Zayas	Business Operations	Closing issues	0.50	\$360.00	\$180.00
5/14/2021	Nicole Donecker	Business Operations	Preparation of summary of account holdings; update of QuickBooks	2.80	\$290.00	\$812.00
5/18/2021	Nicole Donecker	Business Operations	Phone consult with STC client re: open account	0.40	\$290.00	\$116.00
5/19/2021	Nicole Donecker	Business Operations	Preparation of distribution to client; review of Star accounts for ACTC	1.80	\$290.00	\$522.00
5/20/2021	Nicole Donecker	Business Operations	STC banking; preparation of Star transfer forms; preparation of payments to vendors; organization and filing of STC files	3.00	\$290.00	\$870.00
5/20/2021	Ricardo Zayas	Business Operations	Closing issues; Star transfer	0.50	\$360.00	\$180.00
5/25/2021	Nicole Donecker	Business Operations	Review and update final report (Rampart); update cash position; review Star transactions	0.70	\$290.00	\$203.00
5/26/2021	Nicole Donecker	Business Operations	Update of QuickBooks; preparation of payments to vendors	1.10	\$290.00	\$319.00
5/27/2021	Nicole Donecker	Business Operations	Preparation of cash position;; reconciliation of cash	0.80	\$290.00	\$232.00
6/3/2021	Nicole Donecker	Business Operations	Update QuickBooks; vendor payment	0.70	\$290.00	\$203.00
6/8/2021	Nicole Donecker	Business Operations	Preparation of transfer document; phone consult with STC client	1.30	\$290.00	\$377.00
6/9/2021	Nicole Donecker	Business Operations	Phone consult with STC client; preparation of Star transfer form; phone consult with P. Durrant re: account holdings	1.10	\$290.00	\$319.00
6/10/2021	Nicole Donecker	Business Operations	Phone consult with client; review of transaction history; review of documents	0.70	\$290.00	\$203.00
6/16/2021	Nicole Donecker	Business Operations	Preparation of account transfer; phone consult with A. Are re: MMI clients; preparation of MMI note holder list	2.50	\$290.00	\$725.00
6/16/2021	Ricardo Zayas	Business Operations	MMI and property sale	0.50	\$360.00	\$180.00
6/17/2021	Nicole Donecker	Business Operations	Preparation of account transfer; preparation of responses to advisor and client; phone consult with STC client; preparation of report to the court	4.00	\$290.00	\$1,160.00
6/17/2021	Ricardo Zayas	Business Operations	Review MMI Mgmt issues	0.50	\$360.00	\$180.00
6/18/2021	Nicole Donecker	Business Operations	Phone consult with A. Are re: accounts; phone consult with STC clients; phone consult with Premier Trust; review of client accounts; update of QuickBooks; reconciliation of client account; preparation of final report	6.25	\$290.00	\$1,812.50
6/18/2021	Ricardo Zayas	Business Operations	MMI issue; telecon Star Counsel; telecon Are	0.90	\$360.00	\$324.00
6/23/2021	Nicole Donecker	Business Operations	Preparation of statements; phone consult with STC clients and new custodians; reconciliation of client account	3.80	\$290.00	\$1,102.00



United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust

Production Partner: Ricardo Zayas

U.S. Magistrate Judge Philadelphia, PA 19106

Main Client Name: United States District Court - Summit Trust

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
6/23/2021	Ricardo Zayas	Business Operations	Address MMI issues	0.30	\$360.00	\$108.00
6/24/2021	Nicole Donecker	Business Operations	Preparation of account transfers; phone consult with STC clients and new custodian	7.50	\$290.00	\$2,175.00
6/24/2021	Ricardo Zayas	Business Operations	MMI issues	0.30	\$360.00	\$108.00
6/25/2021	Nicole Donecker	Business Operations	Review of files for destruction or keep in storage unit	1.60	\$290.00	\$464.00
6/29/2021	Nicole Donecker	Business Operations	Preparation of transfers; phone consult with STC clients and advisors	2.60	\$290.00	\$754.00
6/30/2021	Nicole Donecker	Business Operations	Preparation of transfers and distributions; research of prior investments; preparation of final report; reconciliation of cash accounts	3.80	\$290.00	\$1,102.00
6/30/2021	Ricardo Zayas	Business Operations	Closing issues; research Ellis litigation	0.75	\$360.00	\$270.00
7/1/2021	Nicole Donecker	Business Operations	Preparation of distributions and transfers; preparation of PA UC payment	1.40	\$290.00	\$406.00
7/1/2021	Ricardo Zayas	Business Operations	Star and closing issues	0.50	\$360.00	\$180.00
7/2/2021	Nicole Donecker	Business Operations	Review of client accounts; reconciliation of cash	0.40	\$290.00	\$116.00
7/2/2021	Ricardo Zayas	Business Operations	Star docs; Avalon status	0.30	\$360.00	\$108.00
7/6/2021	Nicole Donecker	Business Operations	Keen - Contract beneficiary; review of documents	0.75	\$290.00	\$217.50
7/6/2021	Nicole Donecker	Business Operations	Reconciliation of cash accounts; preparation of final account list; phone consult with STC clients; preparation of transfer	3.80	\$290.00	\$1,102.00
7/6/2021	Ricardo Zayas	Business Operations	Keen issues; communicate Counsel	0.25	\$360.00	\$90.00
7/7/2021	Nicole Donecker	Business Operations	Preparation of final account list; review of client documents; review of accounts	2.40	\$290.00	\$696.00
7/8/2021	Nicole Donecker	Business Operations	Preparation of account closure and distribution; finalize account list; reconcile client account	1.10	\$290.00	\$319.00
7/8/2021	Nicole Donecker	Business Operations	Review of documents to identify specific documents in storage	0.40	\$290.00	\$116.00
7/9/2021	Nicole Donecker	Business Operations	KEEN - review of documents to identify specific documents; preparation of correspondence to Keen beneficiary; review of prior distributions	2.00	\$290.00	\$580.00
7/9/2021	Nicole Donecker	Business Operations	Reconciliation of client account; review of Star transactions	0.60	\$290.00	\$174.00
7/13/2021	Nicole Donecker	Business Operations	Preparation of distribution; preparation of trust resignation and distribution; preparation of final report; review of accounts; reconciliation of client account	6.40	\$290.00	\$1,856.00
7/14/2021	Nicole Donecker	Business Operations	Preparation of final report; review of accounts and holdings	5.00	\$290.00	\$1,450.00
7/14/2021	Ricardo Zayas	Business Operations	Closing issues	0.75	\$360.00	\$270.00
7/15/2021	Nicole Donecker	Business Operations	Preparation of final report; review of accounts; review of QuickBooks	3.00	\$290.00	\$870.00
7/15/2021	Nicole Donecker	Business Operations	Preparation of STC records for storage	2.50	\$290.00	\$725.00
7/16/2021	Nicole Donecker	Business Operations	Preparation of STC records for storage	4.00	\$290.00	\$1,160.00
7/19/2021	Ricardo Zayas	Business Operations	Closing issues	0.25	\$360.00	\$90.00
7/20/2021	Nicole Donecker	Business Operations	Update QuickBooks; STC banking; preparation of documents for storage; scan documents	5.00	\$290.00	\$1,450.00
7/21/2021	Nicole Donecker	Business Operations	Preparation of documents for storage	3.00	\$290.00	\$870.00

United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust

Production Partner: Ricardo Zayas

U.S. Magistrate Judge Philadelphia, PA 19106

Main Client Name: United States District Court - Summit Trust

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
7/21/2021	Nicole Donecker	Business Operations	Review of fee application	0.50	\$290.00	\$145.00
7/22/2021	Nicole Donecker	Business Operations	Review of fee app; preparation of account transfer	1.70	\$290.00	\$493.00
7/27/2021	Nicole Donecker	Business Operations	Preparation of documents for storage and destruction	2.50	\$290.00	\$725.00
7/27/2021	Nicole Donecker	Business Operations	Preparation of Keen distribution	0.60	\$290.00	\$174.00
7/27/2021	Ricardo Zayas	Business Operations	Review closing issues	0.20	\$360.00	\$72.00
7/28/2021	Nicole Donecker	Business Operations	Preparation of documents for storage and destruction	1.00	\$290.00	\$290.00
7/29/2021	Nicole Donecker	Business Operations	Preparation of documents for destruction and storage	1.00	\$290.00	\$290.00
7/29/2021	Nicole Donecker	Business Operations	Preparation of QuickBooks reports; update of QuickBooks; preparation of cash position	1.00	\$290.00	\$290.00
7/29/2021	Ricardo Zayas	Business Operations	Closing issues	0.25	\$360.00	\$90.00
7/10/2020	Ricardo Zayas	Status Reports	Preparation of Exhibits, Schedules and Reports; draft orders	0.10	\$360.00	\$36.00
7/14/2020	Ricardo Zayas	Status Reports	Preparation of Exhibits, Schedules and Reports	2.90	\$360.00	\$1,044.00
7/20/2020	Ricardo Zayas	Status Reports	Preparation of Exhibits, Schedules and Reports	1.75	\$360.00	\$630.00
7/23/2020	Ricardo Zayas	Status Reports	Preparation of Exhibits, Schedules and Reports	1.25	\$360.00	\$450.00
8/7/2020	Ricardo Zayas	Status Reports	Preparation of Exhibits, Schedules and Reports	1.00	\$360.00	\$360.00
7/20/2021	Ricardo Zayas	Status Reports	Prepare applications and summary reports	2.30	\$360.00	\$828.00
7/21/2021	Ricardo Zayas	Status Reports	Prepare final report; review files	1.20	\$360.00	\$432.00
7/28/2021	Nicole Donecker	Status Reports	Meeting with R. Zayas re: final report	0.80	\$290.00	\$232.00
7/28/2021	Nicole Donecker	Status Reports	Preparation of final report and attachments	2.40	\$290.00	\$696.00
7/28/2021	Ricardo Zayas	Status Reports	Prepare final report to Court; closing issues	1.00	\$360.00	\$360.00
<b>Time Total</b>				<b>592.20</b>		<b>\$174,969.50</b>

Expenses						
Date	Task/Employee		Description			Amount
		<b>Postage / Messenger / Copies</b>				
9/1/2020	Alexis Hunter		FEDEX 7-109-67838			\$27.79
9/1/2020	Alexis Hunter		FEDEX 7-109-67838			\$29.39
9/1/2020	Alexis Hunter		FEDEX 7-109-67838			\$29.39
9/1/2020	Alexis Hunter		FEDEX 7-109-67838			\$36.55
9/11/2020	Desiree Rose		Fed Ex 7-116-76206			\$29.39
9/11/2020	Desiree Rose		Fed Ex 7-116-76206			\$29.39
9/11/2020	Desiree Rose		Fed Ex 7-116-76206			\$29.39
9/11/2020	Desiree Rose		Fed Ex 7-116-76206			\$29.39
9/11/2020	Desiree Rose		Fed Ex 7-116-76206			\$36.55
9/11/2020	Desiree Rose		Fed Ex 7-116-76206			\$36.55
9/11/2020	Desiree Rose		Fed Ex 7-116-76206			\$38.18
9/11/2020	Desiree Rose		Fed Ex 7-116-76206			\$62.85
9/29/2020	Desiree Rose		Fed Ex 7-135-87827			\$29.19
9/30/2020	Desiree Rose		Fed Ex 3-300-60620			\$95.35
10/13/2020	Desiree Rose		Fed Ex 7-149-56163			\$29.19
10/13/2020	Desiree Rose		Fed Ex 7-149-56163			\$29.25
10/20/2020	Desiree Rose		Fed Ex 7-156-25870			\$23.55
1/14/2021	Desiree Rose		Fed Ex 7-242-95451			\$25.29
1/14/2021	Desiree Rose		Fed Ex 7-242-95451			\$25.29
1/19/2021	Desiree Rose		Fed Ex 7-249-75846			\$25.29

United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust  
U.S. Magistrate Judge Philadelphia, PA 19106

Production Partner: Ricardo Zayas

Main Client Name: United States District Court - Summit Trust

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
2/2/2021	Desiree Rose		Fed Ex 7-264-46676			\$15.43
2/2/2021	Desiree Rose		Fed Ex 7-264-46676			\$25.03
2/16/2021	Desiree Rose		Fed Ex 7-279-18006			\$18.73
3/4/2021	Desiree Rose		Fed Ex 7-301-28874			\$16.13
3/4/2021	Desiree Rose		Fed Ex 7-301-28874			\$20.43
3/16/2021	Desiree Rose		Fed Ex 7-308-19628			\$16.20
3/16/2021	Desiree Rose		Fed Ex 7-308-19628			\$19.51
3/2/2021	Desiree Rose		Fed Ex 7-293-08650			\$18.76
3/30/2021	Desiree Rose		Fed Ex 7-322-42414			\$14.15
3/30/2021	Desiree Rose		Fed Ex 7-322-42414			\$20.51
4/6/2021	Desiree Rose		Fed Ex 7-330-82555			\$17.50
4/6/2021	Desiree Rose		Fed Ex 7-330-82555			\$49.15
4/6/2021	Desiree Rose		Fed Ex 7-330-82555			\$52.54
4/6/2021	Desiree Rose		Fed Ex 7-330-82555			\$85.88
5/25/2021	Desiree Rose		Fed Ex 7-383-33087			\$16.99
5/25/2021	Desiree Rose		Fed Ex 7-383-33087			\$22.03
5/31/2021	Desiree Rose		Fed Ex 7-390-21128			\$40.86
5/31/2021	Desiree Rose		Fed Ex 7-390-21128			\$42.24
5/31/2021	Desiree Rose		Fed Ex 7-390-21128			\$43.11
5/31/2021	Desiree Rose		Fed Ex 7-390-21128			\$43.11
5/31/2021	Desiree Rose		Fed Ex 7-390-21128			\$43.11
5/31/2021	Desiree Rose		Fed Ex 7-390-21128			\$43.85
5/31/2021	Desiree Rose		Fed Ex 7-390-21128			\$45.95
5/31/2021	Desiree Rose		Fed Ex 7-390-21128			\$45.95
5/31/2021	Desiree Rose		Fed Ex 7-390-21128			\$46.73
6/22/2021	Desiree Rose		Fed Ex 7-412-02261			\$15.75
7/13/2021	Desiree Rose		Fed Ex7-440-92030			\$19.30
	Postage / Messenger / Copies					\$1,556.14
		Technology & Software				
2/12/2021			1099's			\$170.00
3/24/2021			1099's			\$170.00
4/16/2021			1099's			\$150.00
4/16/2021			1099's			\$170.00
		Technology & Software				\$660.00
			Total Expenses			\$2,216.14

United States District Court - Summit - 163540

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court (10125702)

Client 163450

United States District Court - Summit Trust  
U.S. Magistrate Judge Philadelphia, PA 19106

Production Partner: Ricardo Zayas

Engagement 10125702

ADV - 2015 - SEC v. Summit Trust Co. - United States District Court

Main Client Name: United States District Court - Summit Trust

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
<b>Time Summary by Employee</b>				<b>Hours</b>		<b>Amount</b>
	Carrie Goodman		Senior	3.00		\$525.00
	Christopher J. Jud		Senior Manager	8.50		\$2,255.00
	Kaeleigh Kapr		Intern	0.50		\$40.00
	Kati L Allison-Boughton		Director	2.15		\$623.50
	Korah Sabu		Staff	4.75		\$688.75
	Nicole Donecker		Manager	460.45		\$133,530.50
	Patrick Rogers		Senior Manager	39.05		\$10,738.75
	Ricardo Zayas		Partner	73.80		\$26,568.00
	<b>Time Total</b>			<b>592.20</b>		<b>\$174,969.50</b>
<b>T&amp;E Summary by Task</b>				<b>Hours</b>		<b>Amount</b>
	Accounting and Auditing			54.30		\$13,812.50
	Asset Analysis and Recovery			2.15		\$623.50
	Business Operations			521.05		\$155,465.50
	Data Analysis			0.00		\$0.00
	Forensic Accounting			0.00		\$0.00
	Status Reports			14.70		\$5,068.00
	Expenses					\$2,216.14
				<b>592.20</b>		<b>\$177,185.64</b>

# EXHIBIT B-2

United States District court - Summit/TCN - 163451

ADV - 2015 - Summit Trust / Trust Counselors Network (TCN) - (10125703)

Client 163451

United States District Court - Summit/TCN  
U.S. Magistrate Judge Philadelphia, PA 19106

Production Partner: Ricardo Zayas

Engagement 10125703

ADV - 2015 - Summit Trust / Trust Counselors Network (TNC)

Main Client Name: United States District Court - Summit/TCN

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
7/7/2020	Patrick Rogers	Accounting and Auditing	Compliance Services Tax deadline extension / QuickBooks review	0.50	\$275.00	\$137.50
7/8/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	0.50	\$275.00	\$137.50
7/9/2020	Patrick Rogers	Accounting and Auditing	Compliance Services Tax extension and e-file roll	1.00	\$275.00	\$275.00
7/10/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	0.30	\$275.00	\$82.50
7/13/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	0.50	\$275.00	\$137.50
7/14/2020	Patrick Rogers	Accounting and Auditing	Tax Compliance Services	0.50	\$275.00	\$137.50
7/15/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	0.50	\$275.00	\$137.50
3/19/2021	Patrick Rogers	Accounting and Auditing	Compliance Services	0.50	\$275.00	\$137.50
7/26/2021	Patrick Rogers	Accounting and Auditing	Compliance Services	1.50	\$275.00	\$412.50
7/26/2021	Patrick Rogers	Accounting and Auditing	Compliance Services	0.25	\$275.00	\$68.75
7/27/2021	Patrick Rogers	Accounting and Auditing	Compliance Services	2.00	\$275.00	\$550.00
7/15/2020	Ricardo Zayas	Asset Analysis and Recovery	Review	0.20	\$360.00	\$72.00
8/25/2020	Ricardo Zayas	Asset Analysis and Recovery	Review Equitrust correspondence; prepare letter	0.90	\$360.00	\$324.00
9/21/2020	Ricardo Zayas	Asset Analysis and Recovery	Review Equitable documents; prepare redemption forms	0.25	\$360.00	\$90.00
9/22/2020	Ricardo Zayas	Asset Analysis and Recovery	Review and execute redemption documents	0.40	\$360.00	\$144.00
3/12/2021	Ricardo Zayas	Asset Analysis and Recovery	Equitrust close out	0.50	\$360.00	\$180.00
7/1/2020	Nicole Donecker	Business Operations	Review of fee app; preparation of QuickBooks deposit report	0.30	\$290.00	\$87.00
7/9/2020	Nicole Donecker	Business Operations	Preparation of vendor payments; preparation of correspondence to vendor	1.00	\$290.00	\$290.00
7/23/2020	Nicole Donecker	Business Operations	Review of fee apps and draft orders; download bank statements	0.30	\$290.00	\$87.00
7/24/2020	Nicole Donecker	Business Operations	Update of QuickBooks	0.20	\$290.00	\$58.00
8/7/2020	Nicole Donecker	Business Operations	Banking for TCN	0.10	\$290.00	\$29.00
8/12/2020	Nicole Donecker	Business Operations	Review of fee applications	0.30	\$290.00	\$87.00
9/9/2020	Nicole Donecker	Business Operations	Update QuickBooks	0.80	\$290.00	\$232.00
9/22/2020	Nicole Donecker	Business Operations	Review of insurance letters and claims	0.40	\$290.00	\$116.00
9/23/2020	Nicole Donecker	Business Operations	Clean out of STC / TCN storage unit	0.80	\$290.00	\$232.00
9/23/2020	Ricardo Zayas	Business Operations	Review documents in storage for destruction	2.25	\$360.00	\$810.00
10/14/2020	Nicole Donecker	Business Operations	Fax correspondence re: account closure	0.20	\$290.00	\$58.00
10/29/2020	Nicole Donecker	Business Operations	Preparation of vendor payments; preparation of LPT unit sale	0.50	\$290.00	\$145.00
10/30/2020	Ricardo Zayas	Business Operations	Management & Operational Assistance; TCN Viaticals	0.20	\$360.00	\$72.00
1/8/2021	Nicole Donecker	Business Operations	Preparation of deposit; TCN banking; preparation of QuickBooks files; review of bank activity	1.60	\$290.00	\$464.00
3/7/2021	Nicole Donecker	Business Operations	Preparation of payment to vendors; review of bank documents	1.25	\$290.00	\$362.50
3/9/2021	Nicole Donecker	Business Operations	Review and reconciliation of client account	0.30	\$290.00	\$87.00

United States District court - Summit/TCN - 163451

ADV - 2015 - Summit Trust / Trust Counselors Network (TCN) - (10125703)

**Client** 163451 United States District Court - Summit/TCN  
U.S. Magistrate Judge Philadelphia, PA 19106

**Engagement** 10125703 ADV - 2015 - Summit Trust / Trust Counselors Network (TNC)

Production Partner: Ricardo Zayas  
Main Client Name: United States District Court - Summit/TCN

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
5/14/2021	Nicole Donecker	Business Operations	Update of QuickBooks	0.30	\$290.00	\$87.00
5/20/2021	Nicole Donecker	Business Operations	Preparation of Fidelity account closure documents and correspondence	0.80	\$290.00	\$232.00
5/27/2021	Nicole Donecker	Business Operations	Preparation of correspondence to close accounts	0.80	\$290.00	\$232.00
6/1/2021	Nicole Donecker	Business Operations	Preparation and fax of account closure documents	0.25	\$290.00	\$72.50
6/3/2021	Nicole Donecker	Business Operations	Update QuickBooks	0.20	\$290.00	\$58.00
6/4/2021	Nicole Donecker	Business Operations	Phone consult with investment holding re: documents to close account	0.30	\$290.00	\$87.00
6/8/2021	Nicole Donecker	Business Operations	Phone consult with investment account entities; preparation of correspondence	0.50	\$290.00	\$145.00
6/25/2021	Nicole Donecker	Business Operations	Review of files for destruction or keep in storage unit	1.60	\$290.00	\$464.00
7/14/2021	Nicole Donecker	Business Operations	Preparation of final report; review of accounts; review of accounts payable	2.00	\$290.00	\$580.00
7/15/2021	Nicole Donecker	Business Operations	Preparation of final report; review of QuickBooks	1.00	\$290.00	\$290.00
7/20/2021	Nicole Donecker	Business Operations	Update QuickBooks; STC banking; preparation of documents for storage; scan documents	2.00	\$290.00	\$580.00
7/21/2021	Nicole Donecker	Business Operations	Preparation of documents for storage	2.50	\$290.00	\$725.00
7/27/2021	Nicole Donecker	Business Operations	Preparation of deposit; update of QuickBooks	0.20	\$290.00	\$58.00
7/29/2021	Nicole Donecker	Business Operations	Preparation of QuickBooks reports; update of QuickBooks	0.40	\$290.00	\$116.00
6/25/2021	Ricardo Zayas	Business Operations	Review and select records for archive; coordinate confidential destruction	4.50	\$360.00	\$1,620.00
7/20/2020	Ricardo Zayas	Status Reports	Preparation of Exhibits, Schedules and Reports	0.50	\$360.00	\$180.00
8/7/2020	Ricardo Zayas	Status Reports	Preparation of Exhibits, Schedules and Reports	0.80	\$360.00	\$288.00
5/25/2021	Nicole Donecker	Status Reports	Review and update final report	0.50	\$290.00	\$145.00
7/21/2021	Nicole Donecker	Status Reports	Review of fee application	0.50	\$290.00	\$145.00
7/22/2021	Nicole Donecker	Status Reports	Review of fee application	0.70	\$290.00	\$203.00
				<b>41.15</b>		<b>\$12,547.75</b>

United States District court - Summit/TCN - 163451

ADV - 2015 - Summit Trust / Trust Counselors Network (TCN) - (10125703)

Client 163451

United States District Court - Summit/TCN  
U.S. Magistrate Judge Philadelphia, PA 19106

Production Partner: Ricardo Zayas

Engagement 10125703

ADV - 2015 - Summit Trust / Trust Counselors Network (TNC)

Main Client Name: United States District Court - Summit/TCN

Time Summary by Employee			Hours		Amount
Nicole Donecker	Manager		22.60		\$6,554.00
Patrick Rogers	Senior Manager		8.05		\$2,213.75
Ricardo Zayas	Partner		10.50		\$3,780.00
Time Total			41.15		\$12,547.75

T&E Summary by Task		Hours		Amount
Accounting and Auditing		8.05		\$2,213.75
Asset Analysis and Recovery		2.25		\$810.00
Business Operations		27.85		\$8,563.00
Data Analysis		0.00		\$0.00
Forensic Accounting		0.00		\$0.00
Status Reports		3.00		\$961.00
Expenses				\$0.00
		41.15		\$12,547.75



# EXHIBIT B-3

United States District Court - Summit/Rampart - 163452

ADV - 2015 - Summit Trust / Rampart Fund LP (Rampart) - United States District Court (10125704)

**Client** 163452 United States District Court - Summit/Rampart  
U.S. Magistrate Judge Philadelphia, PA 19106

**Engagement** 10125704 ADV - 2015 - Summit Trust / Rampart Fund LP (Rampart)

Production Partner: Ricardo Zayas  
Main Client Name: United States District Court - Summit/Rampart

Date	Task/Employee	SEC Classification	Description	Invoice Hours	Approved Rates	Amount
7/7/2020	Patrick Rogers	Accounting and Auditing	Compliance Services Tax deadline extension / QuickBooks review	0.50	\$240.00	\$120.00
7/8/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	0.50	\$240.00	\$120.00
7/9/2020	Patrick Rogers	Accounting and Auditing	Compliance Services Tax extension and e-file roll	0.75	\$240.00	\$180.00
7/10/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	0.30	\$240.00	\$72.00
7/13/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	0.50	\$240.00	\$120.00
7/14/2020	Patrick Rogers	Accounting and Auditing	Tax Compliance Services	0.50	\$240.00	\$120.00
7/15/2020	Patrick Rogers	Accounting and Auditing	Compliance Services	1.50	\$260.00	\$390.00
3/19/2021	Patrick Rogers	Accounting and Auditing	Compliance Services	0.50	\$240.00	\$120.00
4/15/2021	Patrick Rogers	Accounting and Auditing	Compliance Services	2.00	\$240.00	\$480.00
7/1/2020	Nicole Donecker	Business Operations	Review of fee app	0.20	\$290.00	\$58.00
7/23/2020	Nicole Donecker	Business Operations	Review of fee apps and draft orders; download bank statements	0.30	\$290.00	\$87.00
7/24/2020	Nicole Donecker	Business Operations	Update of QuickBooks	0.30	\$290.00	\$87.00
8/12/2020	Nicole Donecker	Business Operations	Review of fee applications	0.30	\$290.00	\$87.00
1/8/2021	Nicole Donecker	Business Operations	Preparation of QuickBooks; review of bank activity	1.00	\$290.00	\$290.00
7/10/2020	Ricardo Zayas	Business Operations	Close Raymond James	0.20	\$360.00	\$72.00
9/24/2020	Ricardo Zayas	Business Operations	Review OS app payments	0.40	\$360.00	\$144.00
5/21/2021	Nicole Donecker	Status Reports	Preparation of final report - Rampart section	0.90	\$290.00	\$261.00
7/20/2020	Ricardo Zayas	Status Reports	Preparation of Exhibits, Schedules and Reports	0.25	\$360.00	\$90.00
8/7/2020	Ricardo Zayas	Status Reports	Preparation of Exhibits, Schedules and Reports	0.50	\$360.00	\$180.00
<b>Time Total</b>				<b>11.40</b>		<b>\$3,078.00</b>

United States District Court - Summit/Rampart - 163452

ADV - 2015 - Summit Trust / Rampart Fund LP (Rampart) - United States District Court (10125704)

**Client** 163452 United States District Court - Summit/Rampart  
U.S. Magistrate Judge Philadelphia, PA 19106

**Engagement** 10125704 ADV - 2015 - Summit Trust / Rampart Fund LP (Rampart)

Production Partner: Ricardo Zayas  
Main Client Name: United States District Court - Summit/Rampart

Time Summary by Employee		Hours		Amount
Nicole Donecker	Manager	3.00		\$870.00
Patrick Rogers	Senior Manager	7.05		\$1,722.00
Ricardo Zayas	Partner	1.35		\$486.00
<b>Time Total</b>		<b>11.40</b>		<b>\$3,078.00</b>

T&E Summary by Task		Hours		Amount
Accounting and Auditing		7.05		\$1,722.00
Asset Analysis and Recovery		0.00		\$0.00
Business Operations		2.70		\$825.00
Data Analysis		0.00		\$0.00
Forensic Accounting		0.00		\$0.00
Status Reports		1.65		\$531.00
Expenses				\$0.00
		<b>11.40</b>		<b>\$3,078.00</b>

# EXHIBIT C

SMART DEVINE  
LITIGATION SERVICES  
HOURLY FEE SCHEDULE

MANAGING DIRECTOR	-	\$360.00
DIRECTOR	-	\$325.00
SENIOR MANAGER	-	\$300.00
MANAGER	-	\$290.00
SENIOR ASSOCIATE	-	\$240.00
ASSOCIATE	-	\$160.00
PARAPROFESSIONAL	-	\$115.00
INTERN	-	\$ 75.00
EXECUTIVE ASSISTANT	-	\$ 60.00

In Support Of  
United States Securities and Exchange Commission v. Summit Trust Company, et al.